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Kate Lloyd
Energy Code Reform, Ofgem
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By email only

12 January 2026

Dear Kate,

OVO response to Ofgem's statutory consultation on modifications to industry codes to implement the harmonised code modification prioritisation process

Thank you for the opportunity to respond to this consultation. Our responses to the consultation questions are provided in the appendix below.

We would be happy to discuss our response further, and should you have any questions please contact policy@OVOenergy.com.

Kind regards,

Jonathan Coe
Industry Change Manager, OVO

APPENDIX

Q1: Do you agree with the policy and associated code modifications proposed in Section 1. Prioritisation process?

Yes, we agree that it is appropriate for a proposer to provide a view on the priority of their modification as part of the original submission. We would expect code administrators/managers, as they do more broadly, to provide critical friend support to proposers on this matter.

We also agree that it is sensible for code panels, or the REC Code Manager in the case of the REC, to be responsible for determining the prioritisation status of a modification, and that this should be secondary to an assessment of urgency.

Q2: Do you agree with the policy and associated code modifications proposed in Section 2. Prioritisation criteria and governance?

We agree with the proposed prioritisation criteria, however we are uncertain how a change to the annual SDS (for example to align with updated government policy) may impact the prioritisation status of a modification, particularly where a high priority modification is nearing completion, but is suddenly reclassified due to a change in the SDS. We do not think it would be appropriate or efficient to deprioritise the progression of a modification which is nearing the end of the modification process.

In the event that a change in SDS content does drive a re-prioritisation of a code modification (i.e. from high priority to standard priority), we would suggest that code managers should have an ability to determine whether modifications should be withdrawn where they are no longer aligned with the updated SDS. This should ensure that code manager and industry resource is not wasted on modifications which no longer deliver upon the government priorities of the day. We would welcome further clarity and consideration on this matter.

Furthermore, it is important that modifications raised which do not have an interaction with the SDS, but which aim to address identified defects in codes which are having a material impact on parties or consumers, are not unduly deprioritised. Such modifications are integral to ensuring the effective and efficient operation of the industry, and avoiding consumer detriment, and should not be deprioritised simply because they do not interact with the SDS.

We agree with the proposed prioritisation categories, however it is not clear in the consultation what the effect of designating a modification as high priority would be. We would welcome further clarity on whether, for example, high priority modifications could be progressed without a consultation stage. We do not think this would be appropriate given the importance of industry input into the development of modifications and their solutions.

Q3: Do you agree with the policy and associated code modifications proposed in Section

3. Prioritisation reporting and governance?

Yes.

Q4: Do you agree with the policy and associated code modifications proposed in Section 4. Policy implementation?

We agree that it is appropriate for all live modifications to be assessed against the new prioritisation criteria. However, we believe it should be a last resort to require a proposer to resubmit a modification with additional information, given the existing resource pressures that already exist for industry parties. Therefore, we believe that code panels and the REC Code Manager should take all reasonable steps to determine the prioritisation status of a live modification based on the information available.

Q5: Do you agree with our proposed implementation date of 28 days from the publication of the related prioritisation policy decision notice?

Yes, we agree this is an appropriate implementation timetable.

Q6: Do you agree with the proposed guidance in 'Annex A: Proposed Authority guidance on code modification prioritisation'?

Yes, we do not have any specific comments on the proposed guidance document.

Q7: Do you agree with the proposed code text drafting published in annexes B-L?

Yes.