

Consultation name: Establishing a harmonised prioritisation process in the Industry Codes: statutory consultation

Issued by: Ofgem

Territorial extent: Great Britain

Response author: SGN

Deadline for responding: 12th January 2026



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12th January 2026

Establishing a harmonised prioritisation process in the Industry Codes: statutory consultation

Thank you for the opportunity to respond to the above consultation¹ in relation to the next steps towards Energy Code Reform and the processes which will be impacted as part of this harmonised prioritisation process approach. The below response follows on from the previous engagement provided by SGN to Ofgem's ongoing Energy Code Reform consultations.

SGN is supportive of the intention to implement a harmonised prioritisation process and agree that this will assist industry in focussing effort and resources towards those changes which most closely deliver the Strategic Direction Statement.

However, as highlighted in our detailed response to the questions below (particularly Question 5), we do raise some concerns with the implementation timescales and would recommend that a greater lead time is provided in order for industry to accurately implement the arrangements.

I trust the above feedback is useful, and would welcome further engagement with Ofgem should that be helpful. Should you wish to discuss further, please do not hesitate to contact me at Sally.Hardman@SGN.co.uk.

Yours faithfully,

Sally Hardman

Regulatory Process Manager

SGN

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Response Template to specific questions

Template part 1: your organisation's details

Contact name	Sally Hardman
Role title	Regulatory Process Manager
Company name	SGN
Telephone number	
Email address	sally.hardman@sgn.co.uk
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: We are supportive of the overarching policy of the Prioritisation Process and agree that the modifications deliver the intent of the changes.

There is however one area of conflict created by the code modification legal text, specifically in relation to the Uniform Network Code (UNC) regarding “Fast Track Self Governance” (FTSG). As such we have provided the detail response below.

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Notwithstanding this issue, SGN believe the inclusion and consideration of the modification proposer in the prioritisation process will facilitate engagement at the commencement and development of a modification proposal and ensure a rounded view of the modification is presented to the Code Panel for determination. Moreover we are pleased that Ofgem have chosen to utilise the Cross Code Steering Group (CCSG) in relation to allocating the lead Code for Cross-code modifications.

Fast Track Self Governance (FTSG) modifications

Whilst we agree with the principle of 7.2.3 (b)(v) the drafting states where a modification is not determined to be an Urgent Modification Proposal it shall not be subject to the Prioritisation process. Due to the nature of modifications that are determined to be “Fast Track Self Governance” and the existing UNC rules in relation to the process for these, we believe that they should also be excluded from the prioritisation process as by their nature they are intended to be quickly executed and are not reviewed by any workgroup. The purpose of a FTSG modification is to correct any non-material errors in the UNC document, and as such they should not be subject to the prioritisation process as (a) to do so would extend what is designed to be a brief remediative process, and (b) a FTSG modification is unlikely to directly correspond with any of the prioritisation criteria.

We therefore ask that the wording is amended to exclude FTSG modifications from the process, in order to introduce efficiency and avoid any conflicting governance, to:

(v) where the Modification Proposal has been determined not to be an Urgent Modification Proposal, or a Fast Track Self Governance Modification Proposal, has been accorded a relevant Prioritisation Category, assessed pursuant to paragraph 7.2.2 (h) as compared with other Modification Proposals’ assessments pursuant to paragraph 7.2.2 (h); or ...

We also ask that the drafting for 12.14.1 (a) is also expanded to include Fast Track Self Governance modifications and suggest:

12.14.1 The Code Administrator shall prepare and publish an updated Modification Register on its Website, which shall include:

(a) whether each Modification Proposal has been determined to be an Urgent Modification Proposal or a Fast Track Self Governance Modification Proposal, or, where a Modification Proposal has been determined to not be an Urgent Modification

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Proposal or a Fast Track Self Governance Modification Proposal, its Prioritisation Category; and

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

Agree

Comments: None

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

Agree

Comments: None

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

Disagree

Comments: We broadly agree, however, as per our response to Question 5, there are some nuances associated with implementation which we think should be considered and taken into account.

Furthermore, we note that the drafting requires slight amendment in relation to the UNC Panel Powers, as follows.

Under the UNC specific obligations cannot be placed on the code panel, instead they are placed on the code administrator to request the panel to carry out a function. Therefore, we believe the wording of this specific element should state:

12.13.1 The Code Administrator shall schedule an [annual] review of the Prioritisation Category of Modification Proposals as part of the UNC Panel agenda and following UNC Panels determinations adjust the relevant modification timetable for each Modification Proposal accordingly.

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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: SGN has concerns that placing a limited 28-day period post decision could create resourcing issues from both a Code Administrator and also Industry perspective. Whilst we recognise the value of having a set implementation deadline, it should be noted that irrespective of whether the 28 days are Calendar, or Working, days, we do not consider that this is an achievable timeline and would caution against pursuing an unnecessarily expedited implementation deadline potentially at the cost of accurate and detailed application of what is a new and unfamiliar process. We would suggest a longer implementation period is considered.

Furthermore, the activity to review all existing live modifications and apply a prioritisation rating, while we agree is necessary, is an extensive piece of work requiring significant resource from both the Code Administrator and industry. As such, we assume that this activity can be completed post-implementation and is not time-limited, save for Ofgem's expectation that it is completed "in a timely manner" (6, Annex A, Prioritisation Guidance). The alternative approach of completing this work within the 28-day implementation period would be for Ofgem to provide the proposed Guidance and any further documentation to Code Administrators prior to the issuance of the direction therefore enabling CAs to progress with amending Modification Templates. We would welcome Ofgem's confirmation of this position, in the interests of clarity.

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

Disagree

Comments: As per our response to Question 5, whilst we principally support the changes, we do not consider that implementation can reasonably take place in 28 (either Calendar or Working) days, even with industry working in good faith, and as such this timeline should be amended.

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

Disagree

Comments: Although in general we are supportive of the intent of the proposed legal text changes set out within Annex L: Uniform Network Code (UNC), as highlighted in our responses to Questions 1 and 4 above we are of the opinion that these areas of UNC with which the drafting creates a conflict, and therefore we have proposed amended working which we consider to be more consistent with the application of the intended policy position.