



Kate Lloyd
Energy Code Reform Team
10 South Colonnade,
Canary Wharf,
London,
E14 4PU

12 January 2026

Email: industrycodes@ofgem.gov.uk

Statutory consultation on modifications to industry codes to implement the harmonised code modification prioritisation process

Dear Kate,

Xoserve welcome the opportunity to give feedback on Ofgem's statutory consultation on modifications to industry codes to implement the harmonised code modification prioritisation process.

As the Central Data Service Provider (CDSP) for the gas industry, Xoserve are responsible for managing and maintaining the gas industry's central data systems which underpin critical processes, including metering, billing and settlement. We provide a single, consistent point of service for our customers and make sure their data is transported securely.

In our role as CDSP, Xoserve holds non-voting positions on the UNC Modification Panel and UNCC, where this consultation was recently discussed. We fully support a revised prioritisation process that is aligned across all codes, enabling efficient cross-code change and improving transparency. Prioritising modifications based on clear criteria, rather than the current first-come-first-served approach, is a logical and necessary step forward. We also work closely with the Joint Office and, as highlighted in a recent joint letter to Ofgem, we strongly support a Unified Gas Network Code Manager model that draws on the strengths of our respective organisations.

We hope you find our thoughts above and our question-specific responses useful. We look forward to working with Ofgem and other code parties to ensure effective implementation of the harmonised code modification prioritisation process.



Kind regards,

Clive Nicholas
Director of Strategy and Development

Part 1: Xoserve Ltd Contact Details

Contact name	Clive Nicholas
Role title	Director of Strategy & Development
Company name	Xoserve
Address	Lansdowne Gate, 65 New Rd, Solihull B91 3DL
Telephone number	07818 077021
Email address	Clive.nicholas1@xoserve.com
Do you want your response treated as confidential?	No

Part 2: Xoserve Ltd Consultation Response

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

- **Strongly agree**

We agree that a consistent approach to the prioritisation of code modifications across all codes would support efficient cross-code change and improve transparency, and that this will be increasingly important given the scope for strategic changes arising from the strategic direction statement (SDS).

We agree that the code modification proposer should provide an assessment of their proposal against the prioritisation criteria so that their views and expertise can be considered when prioritisation decisions are made. We also agree that code panels should be the prioritisation decision makers, giving due regard to the proposers' assessment.

We provide specific comments on the code text drafting in our response to Question 7 below.



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

- **Agree**

We agree that SDS alignment, complexity and importance are appropriate criteria to determine the relative prioritisation of code modifications into standard or high priority categories.

We note that consideration of systems implications should be an important component of any assessment of modification complexity and importance.

For example:

- the extent of system change required is an important element of any assessment of modification complexity; and
- modifications that facilitate large-scale system replacements should be recognised in any assessment of modification importance.

The criteria, as defined, allow a degree of subjectivity and, therefore, care will need to be taken to ensure consistency of assessment across given timelines to allow code panels to effectively manage their workload.

We provide specific comments on the code text drafting in our response to Question 7 below.

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

- **Agree**

We agree that there should be scope to periodically review the prioritisation categorisation of modifications to ensure that this categorisation remains appropriate. We believe that this is necessary for a number of reasons:

- the relative prioritisation of a particular modification may change as the queue of modifications, and therefore the panel's potential workload, changes;
- a periodic review of modification priority is also important to ensure that standard priority modifications are not inappropriately stalled as they are leapfrogged by other modifications; and
- the information available on the complexity of a given modification – particularly in relation to the systems changes required – may change as a clearer picture of requirements develops.

We agree that conducting such reviews on a biannual basis is a useful backstop, but that additional ad hoc reviews may also be required. We note that such ad hoc reviews can be carried out at the discretion of the panel, and may be triggered by the publication of the SDS, release of other



Authority documents, or the introduction of new government policy. We believe that the availability of additional information on system needs or implications could be an additional factor that could trigger an ad hoc review in certain circumstances.

We agree that publication of prioritisation decisions (and reasons) in both a modification register, and relevant reports, is essential to ensure transparency of the process. We also agree that inclusion of a specific appeals process is unnecessary at this stage.

We provide specific comments on the code text drafting in our response to Question 7 below.

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

- **Agree**

Given that a relative prioritisation of modifications is proposed, taking into account panel workloads, the inclusion of live modifications in this process seems sensible to ensure consistency, transparency and the most effective allocation of panel time and resources. However, this should be done in a transparent way, and such reviews should be undertaken quickly to ensure that live modifications are not unnecessarily delayed.

We provide specific comments on the code text drafting in our response to Question 7 below.

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

- **Agree**

We agree that a period of 28 days between publication of the prioritisation policy decision notice and the implementation of the associated policy and changes is appropriate provided that the decision notice does not include significant changes to policy that have not been subject to full stakeholder consultation.

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

- **Agree**

We broadly agree with the proposed guidance in 'Annex A: Proposed Authority guidance on code modification prioritisation'. However, we propose a few minor amendments / clarifications as detailed below.

As stated in our response to Question 2 above, we believe that the extent of system change required is an important element of any assessment of modification complexity, and, as such, we believe that this should be explicitly referenced in the guidance to applying the 'complexity' criterion on pages 10 and 11. We believe that an explicit acknowledgement that a modification that facilitates large-scale system replacements could justify higher prioritisation should also be recognised in the guidance to applying the 'importance' criterion on page 10.

Finally, as noted in our response to Question 3 above, we believe that the availability of additional information on system needs or implications could be an additional factor that could trigger an ad hoc review in certain circumstances, and this should be acknowledged in the guidance on page 13.

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

- **Agree**

We have focused our review and comments on proposed changes to the text of the IGT UNC and UNC provided in Annexes G and L respectively. We are in broad agreement with the proposed code text drafting for the IGT UNC and the UNC.

However, we note that the scope for ad hoc review of the categorisation of modifications, as outlined in the consultation and associated draft guidance, is not reflected in the relevant code drafting provided. The requirement for progress reports and modification-specific reports to include details of the panel's determination on the prioritisation category of the modification proposal is also not reflected in the drafting provided.

We would also make the following minor comments:

- IGT UNC paragraph 18.7(g) – first reference to paragraph 18.5(d) uses a comma (18,5(d)) rather than a full stop.
- IGT UNC paragraph 35 – closing punctuation of sub-clause (b) should not be a full stop, and should include "and".
- UNC paragraph 9.3.8(b) – question whether the phrase "taking into account the Prioritisation Criteria" is necessary as the Prioritisation Criteria only apply to modifications determined not to be Urgent – dealt with at the end of this bracketed sentence, therefore reference to the Prioritisation Category in this instance should be sufficient.
- UNC paragraph 9.4.1(i) – this phrase is missing a verb e.g. "detail" as per 12.9.1(f).
- UNC paragraph 12.14.1(b) – end the subclause with "; and".

no change need to deal
with urgency

otherwise all done

Template part 3: general feedback

Question	Response
Do you have any comments about the overall process of this consultation?	The overall process for this consultation has been effective and appropriate.
Do you have any comments about its tone and content?	The tone and content of this consultation has been appropriate.
Was it easy to read and understand? Or could it have been better written?	The consultation was clear and easy to understand.
Were its conclusions balanced?	The proposals are balanced and justified.
Did it make reasoned recommendations for improvement?	Yes.
Any further comments?	No.