

Consultation

Proposed Code Manager Standard Licence Modifications relating to Data Best Practice

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Response deadline: 10 September 2026

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We¹ are consulting on expanding the obligation to follow Data Best Practice Guidance² (“DBP Guidance”) to licensed Code Managers. This consultation follows our previous Decision regarding the expansion of Data Best Practice as a Code Obligation, which set out our intention to consult on the inclusion of a requirement to comply with DBP Guidance in the Code Manager standard licence³. We seek views from organisations and people with an interest in digitalisation of the energy system, administration of energy codes, suppliers, and code parties. We particularly welcome responses from third parties who operate under energy codes. We would also welcome responses from other stakeholders and the public. This document outlines the scope, purpose and questions of the consultation and how you can get involved.

¹ References to the “Authority”, “Ofgem”, “we” and “our” are used interchangeably in this document. The Authority refers to GEMA, the Gas and Electricity Markets Authority. The Office of Gas and Electricity Markets (Ofgem) supports GEMA in its day-to-day work.

² [Data Best Practice guidance | Ofgem](#)

³ [Data Best Practice as a Code Obligation | Ofgem](#)

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Executive summary

The energy system is in a time of generational change and rapidly increasing complexity as the drive towards decarbonisation leads to multidirectional flexibility and balancing of intermittent supply and changing demand. Managing this complexity without digitalisation and the use of high quality, interoperable, open data is not considered practicable. Ofgem's foundational tool for this is DBP Guidance; a principles-based framework covering the quality, accuracy and accessibility of data.

DBP Guidance has been a licence condition for Transmission Operators (TOs), Gas Distribution Networks (GDNs), and the Electricity System Operator/National Energy System Operator (ESO/NESO) since 2021, with DNOs being obligated to follow DBP Guidance since 2023⁴. Following the publication of our Decision in January 2026⁵, the holder of the Smart Meter Communication Licence (SMCL) is now also obliged to follow DBP Guidance.

DBP Guidance has facilitated significant progress in digitalisation and is extending progressively into additional areas of the energy sector as new licensed roles are established under Energy Code Reform⁶. In our 2025 consultation⁷, we proposed that DBP Guidance become an obligation on code parties through a series of licence changes resulting in consequential code modifications. Industry responses to this proposal were strongly in favour of including code bodies in the obligation to follow DBP Guidance but opposed to the method. Most responses recommended that the obligation form part of the Code Manager Standard Licence Conditions.

This consultation outlines the proposal – based upon industry feedback – to include an obligation to follow DBP Guidance as a new condition in the Code Manager Licence, and the rationale behind it. The policy has been previously outlined and socialised within industry through bilateral and multilateral engagement, and the previous consultation and decisions of June 2025 and January 2026 respectively.

⁴ [Consultation on changing the definition of Energy Systems Data in Data Best Practice | Ofgem](#)

⁵ [Data Best Practice as a Code Obligation | Ofgem](#)

⁶ [annex-a-code-manager-standard-licence-conditions.pdf](#)

⁷ [Data Best Practice as a Code Obligation | Ofgem](#)

1. Introduction

This section outlines Ofgem’s proposal to extend the requirement to follow DBP Guidance to licensed Code Managers, ensuring DBP Guidance becomes a consistent part of future code governance under Energy Code Reform. The obligation would apply progressively as Code Managers are licensed, beginning with the first tranche following the decision on this consultation. This approach aims to provide clearer, more coherent digital and data governance across industry codes.

Background

- 1.1 Data Best Practice (DBP) Guidance is Ofgem’s principles-based framework for improving the management of access to, and interoperability of, Energy System Data. Since 2021, DBP Guidance has been embedded as a licence obligation for Transmission Operators (TOs), Gas Distribution Networks (GDNs), and the Energy System Operator/National Energy System Operator (ESO/NESO) and, most recently, the Smart Communication Licence holder, with the intent to improve transparency, support digitalisation, and enable more efficient whole-system outcomes.
- 1.2 In June 2025, Ofgem consulted on proposals to expand DBP Guidance into industry codes by placing obligations on licensees in a way that would trigger consequential code modifications. Respondents broadly supported the strategic intention to embed DBP Guidance more widely, noting the benefits of consistent and outcomes focused based data management across the sector. However, many stakeholders raised strong concerns regarding the proposed delivery route and timing.
- 1.3 Stakeholders instead recommended that DBP Guidance should ultimately be implemented through the forthcoming Code Manager standard licences under the Energy Act 2023⁸, enabling a clearer and more coherent approach aligned with the phased licensing of Code Managers. As Code Managers are responsible for administering and developing industry codes, embedding DBP requirements within their licence obligations is expected to promote the consideration of Data Best Practice principles through code governance processes and support more consistent data practices across the wider energy sector.
- 1.4 In our January 2026 decision⁹, Ofgem agreed with this feedback and confirmed that we would not proceed with the prior proposal to impose licence-driven consequential code modifications. Instead, our decision document confirmed

⁸ [Energy Act 2023](#)

⁹ [DBP As A Code Obligation Decision v2.5 FINAL.pdf](#)

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that we will undertake a consultation to introduce the obligation to follow DBP Guidance as a Standard Licence Condition (SLC) of the Code Manager Licence. During the transition period, alignment with DBP Guidance will continue to be supported through existing mechanisms, including the Code Administration Code of Practice (CACoP) and the Cross Code Digitalisation Steering Group (CCDSG).

What are we consulting on

- 1.5 We welcome input on how DBP Guidance should interact with the wider responsibilities of Code Managers, including their duties relating to code governance, digitalisation and data stewardship. We are seeking feedback on whether the proposed licence-based approach supports a coherent and efficient governance framework, and how it contributes to greater consistency across codes while remaining aligned with the objectives and implementation timetable of the Energy Code Reform programme.
- 1.6 Finally, we invite views on transitional arrangements before all Code Managers are licensed. We also welcome comments on any operational, organisational or technical considerations that may support a smooth and proportionate transition.

Consultation stages

This consultation forms part of a multi-lateral engagement strategy with code bodies, including the formation of a steering group – the Cross Codes Digitalisation Steering Group, which has been running since August 2024 – to engage all affected parties and consideration from industry responses to our 2025 consultation.

Stage 1 Consultation open: 23 July 2026

Stage 2 Consultation closes. Deadline for responses: 10 September 2026

Stage 3 Responses reviewed and published: 31 September 2026

Stage 4 Consultation outcome decision: 31 October 2026

How to respond

- 1.7 We want to hear from anyone interested in this consultation. Please send your response to the person or team named on the front page of this document.
- 1.8 We have asked for your feedback in each of the questions throughout. Please respond to each one as fully as you can.
- 1.9 We will publish non-confidential responses on our website at [Consultations | Ofgem](#).

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Your response, data, and confidentiality

- 1.10 You can ask us to keep your response, or parts of your response, confidential. We will 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.
- 1.11 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 will contact 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.
- 1.12 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 United Kingdom'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 Act 2000. Please refer to our Privacy Notice on consultations, see Appendix 4.
- 1.13 If you wish to respond confidentially, we will keep your response confidential, but we will publish the number, but not the names, of confidential responses we receive. We will not 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.

How to track the progress of a consultation

1. Find the web page for the call for input you would like to receive updates on.
2. Click 'Get emails about this page', enter your email address and click 'Submit'.
3. You will receive an email to notify you when it has changed status.

A consultation has three stages: 'Open', 'Closed (awaiting decision)', and 'Closed (with decision)'.

2. Proposed Standard Licence Condition

This section sets out the framework for introducing DBP Guidance as a Standard Licence Condition (SLC) for Code Managers, explains how the proposal aligns with the wider Energy Code Reform programme, and outlines Ofgem’s role in overseeing and ensuring compliance with DBP Guidance.

Proposed New Standard Licence Condition

- 2.1. In our 2025 consultation¹⁰ and January 2026 decision¹¹, we set out our position that, once licensed, Code Managers would be required to comply with DBP Guidance as a Standard Licence Condition. This position is intended to introduce targeted changes to Code Managers’ responsibilities, including requirements to:
 - operate, on a best endeavours basis, in accordance with the DBP Guidance,
 - improve the sharing and accessibility of data; and
 - support transparency and discoverability via publication of Digitalisation Strategies and Action Plans (DSAPs), providing data users with greater visibility of what data is expected to become available in the future.
- 2.2. As part of the Code Manager Standard Licence Conditions, we propose to incorporate a 33rd Licence Condition, which will set out the licensee's obligations to:
 - a) have a Digitalisation Strategy;
 - b) have a Digitalisation Action Plan;
 - c) update its Digitalisation Strategy and its Digitalisation Action Plan;
 - d) comply with DSAP Guidance; and
 - e) take account of Data Best Practice Guidance when using or making decisions relating to Energy System Data.
- 2.3. The condition also sets out the process the Authority will follow when issuing and amending DSAP Guidance and DBP Guidance. The proposed condition is substantially unchanged from the equivalent digitalisation licence condition currently applied to network licensees¹². We consider this

¹⁰ [Data Best Practice as a Code Obligation | Ofgem](#)

¹¹ [DBP As A Code Obligation Decision v2.5 FINAL.pdf](#)

¹² See ‘Special Condition 9.5 Digitalisation’ of the [Electricity Transmission Licence Special Conditions](#)

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approach appropriate to ensure consistency of obligations across different licensed parties within the energy sector.

- 2.4. In line with this amendment, we will also incorporate the necessary Data Best Practice definitions and relevant guidance documents under Condition 1; Definitions.
- 2.5. This obligation would apply to only licensed Code Managers. Recognising that licences will be introduced in phases, the obligation will apply from the licence commencement date of each Code Manager's licence.
- 2.6. The full draft text for all added and amended Standard Licence Conditions can be found in **Appendix 1** of this document.

DBP Guidance Principles

- 2.7. DBP Guidance is comprised of 11 principles and intended outcomes. These were detailed, most recently, in our 2025 consultation on DBP Guidance as a Code Obligation.¹³ The full detail on expectations for licensees is provided on our website where the DBP Guidance is published.¹⁴
- 2.8. For the purposes of this consultation, the DBP Guidance principles are summarised below:
 1. Identify the roles of stakeholders of Data Assets.
 2. Use common terms within Data Assets, Metadata and supporting information.
 3. Describe data accurately using industry standard Metadata
 4. Enable potential Data Users to understand the Data Assets by providing supporting information.
 5. Make Data Assets discoverable to potential Data Users.
 6. Learn and deliver to the needs of current and prospective Data Users.
 7. Ensure data quality maintenance and improvement is prioritised by Data User needs.
 8. Ensure Data Assets are interoperable with Data Assets from other data and digital services.
 9. Protect Data Assets and systems in accordance with Security, Privacy and Resilience best practice.
 10. Store, archive and provide access to Data Assets in ways that ensures sustained benefits.

¹³ [Data-Best-Practice-Codes-Consultation.pdf](#)

¹⁴ [Data Best Practice guidance | Ofgem](#)

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11. Treat all Data Assets, their associated Metadata and Software Scripts used to process Data Assets as Presumed Open.

2.9. Licensees would be required to use best endeavours to comply with these principles in line with the intended outcomes set out in the DBP Guidance.

Interactions with Code Governance Reform

- 2.11 Ofgem does not currently hold direct oversight of energy industry codes. These responsibilities are with existing code panels, and code administrators and managers. This arrangement will change as the sector transitions to the future Code Manager licensing framework, as set out in Energy Code Reform: Government response on code manager licensing and secondary legislation¹⁵, Energy Code Reform: Government and Ofgem Response to the Consultation on Code Manager Licence Conditions and Code Modification Appeals to the CMA¹⁶, and Energy Code Reform Phase 1 consultation on transitional measures and code changes¹⁷.
- 2.12 This framework will be implemented under powers introduced by the Energy Act 2023¹⁸. It will enable DESNZ and Ofgem to select and license Code Managers with formal responsibility for code governance.
- 2.13 As the Energy Code Reform programme is implemented, the current model will be replaced with a new system in which licensed Code Managers hold formal responsibility for code governance and are directly accountable to Ofgem through a dedicated Code Manager standard licence.
- 2.14. In this context, requiring licensed Code Managers to comply with DBP Guidance is consistent with their role in progressing and assessing code modifications, and ensuring that codes remain effective. Embedding DBP Guidance within the Code Manager standard licence ensures that DBP Guidance principles are applied directly through the processes by which codes are managed and modified. This includes the development and assessment of code modifications that relate to the collection, use, sharing or governance of data within the energy sector.
- 2.15. Ahead of this transition, some parties responsible for code administration, including existing code administrators and Central System Delivery Bodies

¹⁵ [Energy code reform: code manager licensing and secondary legislation - GOV.UK](#)

¹⁶ [Energy code reform: Code manager licence conditions and code modification appeals to the CMA - GOV.UK](#)

¹⁷ [Energy code reform phase 1: transitional measures and code changes | Ofgem](#)

¹⁸ [Energy Act 2023](#)

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(CSDBs), already apply elements of the DBP Guidance on a voluntary basis. Ofgem encourages these parties to adopt DBP Guidance principles, where appropriate, to support consistency in data practices ahead of the new framework.

- 2.16. Under these proposals, only licensed Code Managers will be subject to a formal, enforceable obligation through licence condition to follow DBP Guidance.

Open Data Triage

- 2.17. Open Data Triage is the process carried out by a Data Custodian to determine if there is any evidence of sensitivities associated with Data Assets, their associated Metadata, and Software Scripts used to process Data Assets if they are used as Open Data. It is intended to support the safe and proportionate publication of data by identifying sensitivities and applying appropriate mitigations while maintaining data utility.
- 2.18. Subject to the outcome of this consultation, once DBP Guidance becomes a licence obligation, licensed Code Managers would be required to apply the Open Data Triage process to relevant Energy System Data within their control.
- 2.19. Open Data Triage is described in DBP Guidance¹⁹, with further detail set out in our 2025 consultation on Data Best Practice as a Code Obligation²⁰. Guidance on how to undertake this process is provided in the DBP Guidance Supporting Information, complemented by the ENA Triage Playbook²¹. This also aligns with DBP Guidance, and reflects input from National Protective Security Authority (NPSA) and National Cyber Security Centre (NCSC).
- 2.20. Ofgem has recently concluded a consultation on proposed changes to the Open Data Triage approach²², including in response to the evolving threat landscape and risks associated with the aggregation of publicly available datasets. Whilst we work towards a decision for this consultation, licensees should continue to assess data sensitivity risks and apply existing triage guidance appropriately.

Digitalisation Strategy and Action Plans

- 2.21. Digitalisation Strategies and Digitalisation Action Plans (DSAPs) are also established requirements in network licence conditions. These publications

¹⁹ [Data Best Practice guidance | Ofgem](#)

²⁰ [Data-Best-Practice-Codes-Consultation.pdf](#)

²¹ [ENA Data Triage and Metadata Management Playbook – Energy Networks Association \(ENA\)](#)

²² [Securing open data in energy: triage in data best practice guidance | Ofgem](#)

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are intended to set out to interested parties how organisations approach digitalisation obligations, including how they prioritise data-related activities, take account of stakeholder needs and demonstrate alignment with DBP Guidance, as set out in our Digitalisation Strategy and Action Plan Guidance²³.

- 2.22. In our January 2026 decision²⁴, we concluded that these requirements should extend to licensed Code Managers. We therefore propose to require Code Managers to publish a Digitalisation Strategy every two years, and a Digitalisation Action Plan every six months, aligned to existing network licence conditions, to support a consistent data and digitalisation framework across the sector.
- 2.23. These requirements will apply from the point at which an organisation becomes a licensed Code Manager, reflecting the phased introduction of Code Manager licensing²⁵. Some organisations already publish DSAPs voluntarily, which Ofgem encourages to support readiness.
- 2.24. Code Managers would be expected to publish their first Digitalisation Strategy within two years of licensing²⁶. Subsequent Action Plans will then follow on a six-monthly cycle. Ofgem will provide proportionate support during initial implementation.

Question 1

Do you agree with the structure of our proposed amendments to the Code Manager Standard Licence Conditions, to introduce the requirement to follow Data Best Practice (DBP) Guidance for licensed Code Managers?

²³ [Digitalisation Strategy and Action Plan Guidance](#)

²⁴ [DBP As A Code Obligation Decision v2.5 FINAL.pdf](#)

²⁵ [Energy code reform: second implementation consultation | Ofgem](#)

²⁶ Or 2 years from the point of obligation

3. SLC Introduction and Support

This section sets out the context for the new Standard Licence Condition framework. It seeks views on industry's readiness to follow the licence obligation proposed and explores whether non-licensed bodies already follow DBP Guidance. The section also explores what support or guidance would help organisations prepare for compliance.

Operational Barriers

- 2.25. We are aware that the current code ecosystem varies significantly in terms of digital maturity, resourcing, and operational models. As such, the introduction of DBP Guidance as an SLC could present differing levels of challenge depending on each organisation's digitalisation journey. For example, smaller code bodies, or those without established data governance processes, may require time to embed the capability needed to meet the expectations of DBP Guidance. Similarly, organisations transitioning from an administrative role to a licensed Code Manager role may need to modify or expand systems, digital tooling, or internal processes to meet the obligation in full.
- 2.26. Given these differences, and the fact that licensing will be introduced in phases, we are seeking views on whether any operational, technical, or organisational barriers could affect compliance once a Code Manager becomes licensed. This will help us to identify any areas where further guidance or support would be beneficial during the initial period of implementation.
- 2.27. While DBP Guidance is proposed as a requirement for licensed Code Managers, it is useful to understand the extent to which organisations have already embedded DBP Guidance principles. Voluntary adoption may indicate readiness, highlight good practice, and identify areas where further support or clarification may be needed.
- 2.28. For these reasons, we are seeking views on the extent to which prospective Code Managers already follow the DBP Guidance. Stakeholder feedback will help us assess sector readiness, understand current levels of adoption, and determine whether additional transitional measures may be needed to support prospective Code Managers in complying with the DBP Guidance once the obligation is introduced.

Support Mechanisms

- 2.29. We want to ensure that newly licensed Code Managers have the clarity, tools, and support needed to meet the DBP Guidance obligation effectively from the point their licence takes effect.

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- 2.30. We are seeking views on the types of support, clarification or guidance that would help organisations comply with the DBP Guidance obligation once licensed. This includes any practical tools, documentation, capacity-building measures or transitional arrangements that would facilitate a smooth and proportionate implementation.
- 2.31. Clarity on how DBP Guidance aligns with other Code Manager standard licence obligations and broader code governance requirements may also be important for organisations transitioning into the Code Manager role.

Question 2

If you are a prospective Code Manager, do you currently follow DBP Guidance on a voluntary basis? If not, what are the key barriers preventing adoption (for example, data maturity, capability, resource constraints, legacy systems, or governance arrangements)?

Question 3

What forms of support, clarification, or guidance from Ofgem would help prospective Code Managers comply with the DBP obligation once it becomes a licence requirement? Please include examples of tools, documentation, or transitional arrangements that would be beneficial.

3. Conclusions and Next Steps

- 4.1. This consultation sets out Ofgem’s proposal to introduce a requirement for licensed Code Managers to follow DBP Guidance as a Standard Licence Condition. This approach would place DBP Guidance requirements directly on licensed Code Managers, reflecting their statutory responsibility for code governance under the new framework, and supporting more consistent, user-centred management of code-related data across the energy sector.
- 4.2. The proposed approach through the Code Manager licensing framework also provides a proportionate route for implementation. DBP Guidance would only apply once an organisation becomes a licensed Code Manager, ensuring that obligations reflect the scope and responsibilities of the licence.
- 4.3. Embedding DBP within the Code Manager standard licence will strengthen accountability for data stewardship, help reduce fragmentation in data practices, and support more interoperable, transparent, and accessible energy system data. This aligns with Ofgem’s wider digitalisation objectives, as set out in the Strategic Direction Statement²⁷ (SDS) and Forward Work Programme²⁸ (FWP), supporting a more coordinated, data-driven and consumer-focused energy system within a modernised code governance framework.

Next steps

- 4.4. Ofgem intends to publish a final decision in October 2026. If implemented, the DBP obligation would take effect in line with the phased licensing of Code Managers, with commencement tied to each organisation’s appointment phase. This will mean that obligations begin only when a licence is granted. This ensures proportionality and clarity for newly licensed Code Managers, as they take on formal governance responsibilities.
- 4.5. During the transition period, Ofgem will continue to rely on existing mechanisms, including the CACoP principles, and the CCDSG, to maintain alignment and support good practice across both licensed and non-licensed bodies involved in code administration.
- 4.6. If the DBP Guidance obligation comes into force for licensed Code Managers, Ofgem would be responsible for overseeing compliance with the relevant licence requirements in accordance with its regulatory functions. This will align with the wider Energy Code Reform programme and the Code Manager

²⁷ [Decision on the preliminary Strategic Direction Statement and governance arrangements for industry codes | Ofgem](#)

²⁸ [Forward Work Programme | Ofgem](#)

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licensing arrangements set out in recent Ofgem and government publications²⁹.

- 4.7. Ofgem intends to continue to engage through code fora and bilateral meetings during implementation to identify emerging issues, support a proportionate and phased approach across different codes, and ensure DBP is embedded effectively within the evolving licence-based governance framework.

²⁹ [Energy code manager standard licence conditions: determination notice - GOV.UK](#)

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Send us your feedback

We believe that consultation is at the heart of good policy development. We are keen to receive your comments about this consultation. We would also like to get your answers to these questions:

- Do you have any comments about the quality of this document?
- Do you have any comments about its tone and content?
- Was it easy to read and understand? Or could it have been better written?
- Are its conclusions balanced?
- Did it make reasoned recommendations?
- Do you have any further comments.

Please send your feedback to stakeholders@ofgem.gov.uk.

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Appendix 1 – Legal Wording

To be inserted in “Condition 1: Definitions”

Data Best Practice Guidance means the document of that name issued by the Authority in accordance with standard condition 33 (Digitalisation).

Digitalisation Strategy means a document prepared and published by the Licensee in accordance with Part A of standard condition 33 (Digitalisation).

Digitalisation Action Plan means a document prepared and published by the Licensee in accordance with Part B of standard condition 33 (Digitalisation).

DSAP Guidance means the document of that name issued by the Authority in accordance with Part C of standard condition 33.

Energy System Data has the meaning given to that term in the Data Best Practice Guidance.

Condition 33: Digitalisation

Introduction

33.1. The purpose of this condition is to set out the Licensee's obligations to:

- (a) have a Digitalisation Strategy;
- (b) have a Digitalisation Action Plan;
- (c) update its Digitalisation Strategy and its Digitalisation Action Plan;
- (d) comply with DSAP Guidance; and
- (e) follow DBP Guidance.

33.2. This condition also sets out the process the Authority will follow when issuing and amending DSAP Guidance and DBP Guidance.

Part A: Requirements of the Digitalisation Strategy

33.3. The licensee must publish its Digitalisation Strategy within the first two years of the commencement of licence.

33.4. The licensee must review the progress it has made against its Digitalisation Strategy and update its Digitalisation Strategy at intervals specified in the DSAP Guidance.

33.5. The Licensee must:

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- (a) publish its Digitalisation Strategy, and updates to its Digitalisation Strategy, on its website where they are readily accessible to the public;
- (b) maintain an archive of all published versions of its Digitalisation Strategy on its website where they are readily accessible to the public; and
- (c) notify the Authority of any updates to the Digitalisation Strategy.

Part B: Requirements of the Digitalisation Action Plan

33.6. The Licensee must publish a Digitalisation Action Plan within six months of the date of publication of the initial Digitalisation Strategy.

33.7. The Licensee must review the progress it has made against and update its Digitalisation Action Plan at intervals specified in the DSAP Guidance.

33.8. The Licensee must:

- (a) publish its Digitalisation Action Plan, and each update to its Digitalisation Action Plan, on the licensee's website where they are readily accessible to the public;
- (b) maintain an archive of all published versions of its Digitalisation Action Plan on the licensee's website where they are readily accessible to the public; and
- (c) notify the Authority of any updates to the Digitalisation Action Plan.

Part C: DSAP Guidance

33.9. The licensee must comply with the DSAP Guidance when:

- (a) preparing and updating its Digitalisation Strategy; and
- (b) preparing and updating its Digitalisation Action Plan.

33.10. The Authority will issue and amend the DSAP Guidance by direction.

33.11. The Authority will publish the DSAP Guidance on the Authority's Website.

33.12 The DSAP Guidance will make provision about:

- (a) how the licensee should work towards digitalisation;
- (b) how the licensee should set out in its Digitalisation Strategy and Digitalisation Action Plan how it intends to use Energy System Data to generate benefits for consumers and stakeholders and the specific actions it will take to achieve that outcome;
- (c) the form and content of the Digitalisation Strategy and the Digitalisation Action Plan, including:
 - (i) the structure, content and level of detail of each;

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- (ii) the types of activities that should be covered in each;
- (iii) any required information associated with those activities; and
- (iv) the engagement the Licensee is required to undertake with stakeholders to help inform the development of its Digitalisation Strategy and its Digitalisation Action Plan.

Part D: Requirement to employ data best practice

33.13 The licensee must, when conducting work that involves working with or making decisions about the use of Energy System Data, use its best endeavours to act in accordance with Data Best Practice Guidance.

33.14 The Authority will issue and amend Data Best Practice Guidance by direction.

33.15 The Authority will publish Data Best Practice Guidance on the Authority's Website.

33.16 Data Best Practice Guidance will make provision about how the Authority expects the licensee to comply with data best practice to generate benefits for consumers and stakeholders, including but not limited to ensuring services that involve Energy System Data are designed to meet the needs of consumers and those who directly use the services.

Part E: Process for issuing and amending guidance

33.17 Before amending DSAP Guidance or Data Best Practice Guidance by direction, the Authority will publish on the Authority's Website:

- (a) the text of the amended guidance;
- (b) the date on which the Authority intends the amended guidance to come into effect; and
- (c) the reasons for the amendments to the guidance; and
- (d) a period during which representations may be made on the amendments to the guidance, which will not be less than 28 days.

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Appendix 2 - List of Questions

Question 1

Do you agree with the structure of our proposed amendments to the Code Manager Standard Licence Conditions, to introduce the requirement to follow Data Best Practice (DBP) Guidance for licensed Code Managers?

Question 2

If you are not currently a licensed Code Manager, do you voluntarily follow DBP Guidance? If not, what are the key blockers preventing adoption (e.g. data maturity, capability, resource constraints, legacy systems, governance arrangements)?

Question 3

What forms of support, clarification, or guidance from Ofgem would help you, or future Code Managers, to comply with the DBP obligation once it becomes a licence requirement? Please include examples of tools, documentation, or transitional arrangements that would be beneficial.

Appendix 3 – Glossary

Terms	Definitions
Data Best Practice Guidance	Guidance issued by Ofgem and published at: Data Best Practice guidance Ofgem
Digitalisation Action Plan	A licensee's plan to digitalise its Products and Services prepared and published in accordance with Part B of; Special Condition 9.5 (Digitalisation) of the RIIO-2 price controls for Electricity Transmission, Gas Transmission and Gas Distribution, Condition C3 of the Electricity System Operator Licence and Gas System Planner Licence for the National Energy System Operator, and Special Condition 9.5 (Digitalisation) of the RIIO-ED2 price control for Electricity Distribution.
Digitalisation Strategy	The strategic approach taken by a licensee to digitalise its Products and Services and evidenced by the archive prepared and published by the licensee in accordance with Part A of; Special Condition 9.5 (Digitalisation) of the RIIO2 price controls for Electricity Transmission, Gas Transmission and Gas Distribution, Condition C3 of the Electricity System Operator Licence and Gas System Planner Licence for the National Energy System Operator, and Special Condition 9.5 (Digitalisation) of the RIIO-ED2 price control for Electricity Distribution.
Digitalisation Strategy and Action Plan Guidance	(1) The guidance document issued by the Authority in accordance with Part C of; Special Condition 9.5 (Digitalisation) of the RIIO-2 price controls for Electricity Transmission, Gas Transmission and Gas Distribution, Condition C3 of the Electricity System Operator Licence and Gas System Planner Licence for the National Energy System Operator, Special Condition 9.5 (Digitalisation) of the RIIO-ED2 price control for Electricity Distribution and (2) part of Ofgem's standards for data and digitalisation.
Energy Networks Association (ENA)	The Energy Networks Association is a not-for-profit industry body representing energy network operators in the UK and Ireland.

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Energy System Data	All Data Assets for which an entity is a Data Custodian as a consequence of it exercising its rights and obligations under a licence granted under Section 6 or Section 56FBA of the Electricity Act 1989, or Sections 7, 7ZA, 7A, 7AA, 7AB or 7AC of the Gas Act 1986; or under Section 7(1) of the Energy Act 2023, or by exercising rights and obligations under regulations enacted by Section 219 and Schedule 18 of the Energy Act 2023.
Standard Licence Condition (SLC)	Standard Licence Conditions are conditions that apply to all licensees of a particular licence type.

Appendix 4 – Privacy notice on consultations

Personal data

The following explains your rights and gives you the information you are entitled to under the UK General Data Protection Regulation (UK GDPR).

Note that this section only refers to your personal data (your name, address, or anything that could be used to identify you personally) not the content of your response to the consultation.

1. The identity of the controller and contact details of our Data Protection Officer

The Gas and Electricity Markets Authority is the controller, (for ease of reference, “Ofgem”). The Data Protection Officer can be contacted at dpo@ofgem.gov.uk

2. Why we are collecting your personal data

Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters.

3. Our legal basis for processing your personal data

As a public authority, the GDPR makes provision for Ofgem to process personal data as necessary for the effective performance of a task carried out in the public interest. i.e. a consultation.

4. With whom we will be sharing your personal data

All consultation responses which are not marked as confidential will be published, with any personal details redacted. Any consultations marked as confidential will be retained for internal analysis and not shared outside the Authority.

5. For how long we will keep your personal data, or criteria used to determine the retention period.

Your personal data will be held for seven years after the decision has been made for subsequent analysis and to provide evidence of decision-making in future.

6. Your rights

The data we are collecting is your personal data, and you have considerable say over what happens to it.

You have the right to:

- know how we use your personal data
- access your personal data
- have personal data corrected if it is inaccurate or incomplete

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- ask us to delete personal data when we no longer need it
- ask us to restrict how we process your data
- get your data from us and re-use it across other services
- object to certain ways we use your data
- be safeguarded against risks where decisions based on your data are taken entirely automatically
- tell us if we can share your information with 3rd parties
- tell us your preferred frequency, content and format of our communications with you
- to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law.

You can contact the ICO at <https://ico.org.uk/>, or telephone 0303 123 1113.

7. Your personal data will not be sent overseas**8. Your personal data will not be used for any automated decision making.****9. Your personal data will be stored in a secure government IT system.**

10. More information: For more information on how Ofgem processes your data, read our [Privacy Promise](#).