

Ofgem Consultation on the Implementation of energy code reform: second decision

Citizens Advice response



17 April 2026

We welcome the opportunity to contribute to the ongoing development of energy industry code reform. This response is not confidential and may be freely published.

Section 2

QT1. To what extent do you agree that the proposed code text accurately reflects our policy decisions set out in the main document?

No response provided.

QT2: Are any amendments needed to the proposed code text to ensure it reflects the specific requirements for the BSC and REC?

No response provided.

Section 3

QT3. To what extent do you agree that the proposed SAF text accurately reflects our policy decisions set out in the main document?

No response provided.

QT4: Are any amendments needed to the proposed code text to ensure it reflects the specific requirements for the BSC and REC?

No response provided.

QT5. Do you have any views on whether conflict of interest provisions should be introduced under current panel arrangements?

We agree that robust conflict of interest procedures are important for transparency and to secure trust and confidence in any code modification process. We agree that current panel arrangements should be reviewed to align the proposed Stakeholder Advisory Forum (SAF) conflict of interest requirements with those of existing panels. This should ensure that those panels that may be

continuing in their current form, which could take a number of years, will be consistent in their conflict of interest procedures with the new rules for SAFs.

Further comments on the proposed SAF conflicts of interest requirements

The Proposed SAF text section B8 details matters relating to conflicts of interest. This section specifies that any modification proposer has an automatic conflict of interest and may not vote on the proposal although they may participate in any discussion. B8 further specifies that a modification that may give rise to a conflict of interest to any other SAF member may mean that the SAF chair may direct that the SAF member may not participate in the vote.

In reality, it is likely that a modification proposal may affect many SAF members including with potential positive commercial or other operational benefits. It is not clear whether such a situation would constitute a conflict of interest. If such a potential gain would represent a conflict of interest, it may mean that many SAF members would be ineligible to vote on a proposal. Quoracy (B12.6) appears to only relate to the presence of members rather than their ability to vote, so it is not clear whether the scenario where many SAF members would be ineligible to vote would create a quoracy issue.

We would welcome further clarity as to the circumstances when a conflict of interest will arise for SAF members and the implications for quoracy for meetings and voting.

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