
Implementation of the energy code reform: Second decision – response template

This document provides a template for responses to our new consultation questions on the proposed code text and current conflict of interest provisions.

If you are interested in responding to this consultation, please complete this word document and send it to industrycodes@ofgem.gov.uk by the end of the day on Friday 17 April 2026.

Guidance

We typically publish consultation responses when we publish our decision. To ensure that we can correctly attribute your response, please ensure that you enter all relevant details in the “Your organisation’s details” section (template part 1).

If you would like us to treat your response as being confidential, either in full or in part, please indicate this to us below. Further information on how we will treat your response, data and confidentiality can be found at the end of this document.

Please use template part 2 “Code text consultation responses” to provide your responses. For all questions, the template below provides space for you to enter free text comments. Some questions also ask whether you agree with our proposals. Please indicate the extent to which you agree or disagree with relevant proposals by deleting all but one of the bullets provided.

There is also a section for “General feedback” (template part 3). Please use this section to provide any views on the overall consultation process.

Template part 1: Your organisation's details

Contact name	Karl Maryon
Role title	Chair of DCUSA Limited
Company name	DCUSA Limited
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Date of submission	16 April 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, we are happy for our responses to be openly shared.

Template part 2: Code text consultation responses

Consultation section 2: Future code modifications process

For each section of the proposed code text, please answer the following question:

Question 1: To what extent do you agree that the proposed code text accurately reflects our policy decisions set out in the main document?

Sections A1-A2: To what extent do you agree that the proposed code text accurately reflects our policy decisions set out in the main document?

[Please delete all but one bullet]

- Agree

Comments: We are comfortable that the proposed code text accurately reflects your policy decisions in the main document.

Section A3: To what extent do you agree that the proposed code text accurately reflects our policy decisions set out in the main document?

[Please delete all but one bullet]

- Agree

Comments: We are comfortable that the proposed code text accurately reflects your policy decisions in the main document. However, we believe where there are actions all of these should have a target timescale and/or fixed frequency and not be just open ended obligation.

Section A4: To what extent do you agree that the proposed code text accurately reflects our policy decisions set out in the main document?

[Please delete all but one bullet]

- Agree

Comments: We are comfortable that the proposed code text accurately reflects your policy decisions in the main document. However, we believe where there are actions all of these should have a target timescale and/or fixed frequency and not be just open ended obligation.

Section A5: To what extent do you agree that the proposed code text accurately reflects our policy decisions set out in the main document?

[Please delete all but one bullet]

- Agree

Comments: We are comfortable that the proposed code text accurately reflects your policy decisions in the main document.

Section A6: To what extent do you agree that the proposed code text accurately reflects our policy decisions set out in the main document?

[Please delete all but one bullet]

- Agree

Comments: We are comfortable that the proposed code text accurately reflects your policy decisions in the main document. However, we believe where there are actions all of these should have a target timescale and/or fixed frequency and not be just open ended obligation.

Section A7: To what extent do you agree that the proposed code text accurately reflects our policy decision set out in the main document?

[Please delete all but one bullet]

- Agree

Comments: We are comfortable that the proposed code text accurately reflects your policy decisions in the main document. However, we believe where there are actions all of these should have a target timescale and/or fixed frequency and not be just open ended obligation.

Section A8: To what extent do you agree that the proposed code text accurately reflects our policy decision set out in the main document?

[Please delete all but one bullet]

- Agree

Comments: We are comfortable that the proposed code text accurately reflects your policy decisions in the main document. However, we believe where there are actions all of these should have a target timescale and/or fixed frequency and not be just open ended obligation.

Section A9: To what extent do you agree that the proposed code text accurately reflects our policy decision set out in the main document?

[Please delete all but one bullet]

- Agree

Comments: We are comfortable that the proposed code text accurately reflects your policy decisions in the main document. However, we believe where there are actions all of these should have a target timescale and/or fixed frequency and not be just open ended obligation.

Section A10: To what extent do you agree that the proposed code text accurately reflects our policy decision set out in the main document?

[Please delete all but one bullet]

- Agree

Comments: We are comfortable that the proposed code text accurately reflects your policy decisions in the main document.

Section A11: To what extent do you agree that the proposed code text accurately reflects our policy decision set out in the main document?

[Please delete all but one bullet]

- Agree

Comments: We are comfortable that the proposed code text accurately reflects your policy decisions in the main document. However, we believe where there are actions all of these should have a target timescale and/or fixed frequency and not be just open ended obligation.

Section A12: To what extent do you agree that the proposed code text accurately reflects our policy decision set out in the main document?

[Please delete all but one bullet]

- Agree

Comments: We are comfortable that the proposed code text accurately reflects your policy decisions in the main document. However, we believe where there are actions all of these should have a target timescale and/or fixed frequency and not be just open ended obligation.

We note clause “A12.9 Workgroup members must agree the Workgroup report as set out in A13.9g.” We believe clarity is required on what constitutes agreement as in our experience it is rare for a Workgroup to unanimously agree on everything and a consensus has to apply.

Section A13: To what extent do you agree that the proposed code text accurately reflects our policy decision set out in the main document?

[Please delete all but one bullet]

- Agree

Comments: We are comfortable that the proposed code text accurately reflects your policy decisions in the main document. However, we believe where there are actions all of these should have a target timescale and/or fixed frequency and not be just open ended obligation.

Section A14: To what extent do you agree that the proposed code text accurately reflects our policy decision set out in the main document?

[Please delete all but one bullet]

- Agree

Comments: We are comfortable that the proposed code text accurately reflects your policy decisions in the main document.

Section A15: To what extent do you agree that the proposed code text accurately reflects our policy decision set out in the main document?

[Please delete all but one bullet]

- Agree

Comments: We are comfortable that the proposed code text accurately reflects your policy decisions in the main document.

Section A16: To what extent do you agree that the proposed code text accurately reflects our policy decision set out in the main document?

[Please delete all but one bullet]

- Agree

Comments: We are comfortable that the proposed code text accurately reflects your policy decisions in the main document.

Section A17: To what extent do you agree that the proposed code text accurately reflects our policy decision set out in the main document?

[Please delete all but one bullet]

- Agree

Comments: We are comfortable that the proposed code text accurately reflects your policy decisions in the main document.

Section A18: To what extent do you agree that the proposed code text accurately reflects our policy decision set out in the main document?

[Please delete all but one bullet]

- Agree

Comments: We are comfortable that the proposed code text accurately reflects your policy decisions in the main document.

Section A19: To what extent do you agree that the proposed code text accurately reflects our policy decision set out in the main document?

[Please delete all but one bullet]

- Agree

Comments: We are comfortable that the proposed code text accurately reflects your policy decisions in the main document.

Section A20: To what extent do you agree that the proposed code text accurately reflects our policy decision set out in the main document?

[Please delete all but one bullet]

- Agree

Comments: We are comfortable that the proposed code text accurately reflects your policy decisions in the main document.

Section A21: To what extent do you agree that the proposed code text accurately reflects our policy decision set out in the main document?

[Please delete all but one bullet]

- Agree

Comments: We are comfortable that the proposed code text accurately reflects your policy decisions in the main document.

Section A22: To what extent do you agree that the proposed code text accurately reflects our policy decision set out in the main document?

[Please delete all but one bullet]

- Agree

Question 2: Are any amendments needed to the proposed code text to ensure it reflects the specific requirements for the BSC and REC?

Comments: We are not qualified to comment on this question from a DCUSA perspective.

Consultation section 3: Stakeholder Advisory Forum (SAF)

For each section of the proposed SAF text, please answer the following question:

Question 3: To what extent do you agree that the proposed SAF text accurately reflects our policy decisions set out in the main document?

Sections B1-3: To what extent do you agree that the proposed code text accurately reflects our policy decision set out in the main document?

[Please delete all but one bullet]

- Agree

Comments: We are comfortable that the proposed code text accurately reflects your policy decisions in the main document.

Section B4: To what extent do you agree that the proposed code text accurately reflects our policy decision set out in the main document?

[Please delete all but one bullet]

- Agree

Comments: We are comfortable that the proposed code text accurately reflects your policy decisions in the main document.

Section B5: To what extent do you agree that the proposed code text accurately reflects our policy decision set out in the main document?

[Please delete all but one bullet]

- Agree

Comments: We are comfortable that the proposed code text accurately reflects your policy decisions in the main document.

Section B6: To what extent do you agree that the proposed code text accurately reflects our policy decision set out in the main document?

[Please delete all but one bullet]

- Agree

Comments: We are comfortable that the proposed code text accurately reflects your policy decisions in the main document.

Section B7: To what extent do you agree that the proposed code text accurately reflects our policy decision set out in the main document?

[Please delete all but one bullet]

- Agree

Comments: We are comfortable that the proposed code text accurately reflects your policy decisions in the main document.

Section B8: To what extent do you agree that the proposed code text accurately reflects our policy decision set out in the main document?

[Please delete all but one bullet]

- Agree

Comments: We are comfortable that the proposed code text accurately reflects your policy decisions in the main document.

Section B9: To what extent do you agree that the proposed code text accurately reflects our policy decision set out in the main document?

[Please delete all but one bullet]

- Agree

Comments: We are comfortable that the proposed code text accurately reflects your policy decisions in the main document.

Section B10: To what extent do you agree that the proposed code text accurately reflects our policy decision set out in the main document?

[Please delete all but one bullet]

- Agree

Comments: We are comfortable that the proposed code text accurately reflects your policy decisions in the main document.

Section B11: To what extent do you agree that the proposed code text accurately reflects our policy decision set out in the main document?

[Please delete all but one bullet]

- Agree

Comments: We are comfortable that the proposed code text accurately reflects your policy decisions in the main document. However, we would like to see a timescale included for the minutes to be published and consider 5 working days to be reasonable and especially so when assuming SAF meetings are to be held monthly.

Section B12: To what extent do you agree that the proposed code text accurately reflects our policy decision set out in the main document?

[Please delete all but one bullet]

- Agree

Comments: We are comfortable that the proposed code text accurately reflects your policy decisions in the main document.

Question 4: Are any amendments needed to the proposed code text to ensure it reflects the specific requirements for the BSC and REC?

Comments: We are not qualified to comment on this question from a DCUSA perspective.

Question 5: Do you have any views on whether conflict of interest provisions should be introduced under current panel arrangements?

Comments: We agree that all existing Panels should take the opportunity to review the conflict of interest provisions that are in place and if necessary propose a modification to bring them in line with the future Code Manager provisions.

Template part 3: General feedback

We believe that consultation is at the heart of good policy development. We welcome any comments about how we've run this consultation. We'd also like to get your answers to the following questions.

Question	Response
Do you have any comments about the overall process of this consultation?	Follows usual process. Surprised at the fairly tight deadline given the Easter holiday period.
Do you have any comments about its tone and content?	Perfectly acceptable.
Was it easy to read and understand? Or could it have been better written?	Perfectly acceptable.
Were its conclusions balanced?	We believe so.
Did it make reasoned recommendations for improvement?	We believe so.
Any further comments?	No, thank you for the opportunity to feedback our views.

Your response, data and confidentiality

You can ask us to keep your response, or parts of your response, confidential. We'll 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.

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'll get in touch with 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.

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 UK'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 Utilities Act 2000. Please refer to our Privacy Notice on consultations, see Appendix 4.

If you wish to respond confidentially, we'll keep your response itself confidential, but we will publish the number (but not the names) of confidential responses we receive. We won't 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.