

17 April 2026

Dear Industry Codes Team,

Thank you for the opportunity to respond to your consultation on the template code text for the new code modification process and the Stakeholder Advisory Forum (SAF).

About Elexon

Elexon is an independent, not-for-profit delivery body that has operated for 25 years, playing a critical role in opening markets and supporting the transition to a net zero energy system. We provide governance, settlement and data platforms (Elexon Kinnect), and manage the Balancing and Settlement Code (BSC), enabling the smooth and efficient operation of the electricity market in Great Britain. Over the past year, we have supported more than 130 new market entrants, fostering a more flexible and innovative energy system.

Our end-to-end expertise in governance, assurance, technology, and data supports the industry, Government and Ofgem, as the energy sector transitions to net zero. Building on our purpose of serving the industry, the data we hold is open and accessible for analysis and distribution. As a trusted, independent market expert, we continuously look to evolve and innovate for the benefit of our customers and consumers.

We are preparing for our future role as a licensed Code Manager, working closely with Ofgem to ensure a smooth transition and to build the capabilities required to deliver this role effectively. This includes strengthening our governance, service delivery and stakeholder engagement to support a more coordinated and efficient code management landscape.

Ofgem has appointed us as the Market Facilitator, to coordinate local and national flexibility markets. Our role focuses on reducing barriers, aligning transmission and distribution arrangements, and ensuring better coordination. In December 2025, we successfully achieved go-live for starting operations to coordinate local and national flexibility markets and published our first Delivery Plan outlining key milestones for the period January 2026 - March 2028.

We are also the Implementation Manager for the Market-wide Half Hourly Settlement (MHHS) Programme, a key enabler for the flexibility required for the transition to net zero. In September 2025 we achieved Milestone 10 (M10) of the programme, marking the point where central industry systems became ready to begin migrating Meter Point Administration Numbers (MPANs) to new half-hourly settlement system. This enabled suppliers to start moving customer meters from late October 2025, a crucial step towards the full implementation of MHHS in the electricity retail market. Since then, more than 6 million MPANs have migrated to the new arrangements.

Once MHHS is fully implemented from mid-2027, Elexon will manage up to 500-billion-meter readings every year. Half-hourly data is an important enabler for consumer-led flexibility (CLF) and can encourage more flexible use of energy – in turn reducing household bills and rewarding customers.

Summary

Overall, we believe that the proposed code text generally reflects the policy intent. However, there are several areas which we believe could benefit from greater clarity or should be drafted differently.

In particular, we believe there is a need to resolve what constitutes non-modification business for SAF engagement. The BSC Panel takes a number of decisions which are not modification-related (something we believe is an area where the BSC differs from other codes); however, the current draft text implies it is for us to decide which matters fall into this category, which differs from the policy instructions we received.

All of our comments and questions can be found in the redlined versions of the text we have attached. For the avoidance of doubt, we have not included all changes that we believe are BSC-specific, as these will be addressed separately. Instead, we have highlighted some areas to begin the discussion.

If you would like to discuss any areas of our response, please contact Chris Welby, Head of Code Reform Readiness (chris.welby@elexon.co.uk).

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Victoria Moxham', written over a horizontal line.

Victoria Moxham
Director of Customer & Code Management
Elexon

Appendix 1 – SAF Text
Appendix 2 – Modification Text (to follow)