
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	Matt Newman
Role title	Future Frameworks Manager
Company name	National Gas
Telephone number	+44 (0)7548 773619
Email address	Matthew.newman2@nationalgas.com
Date of submission	17th 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, happy for the response to be published

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?

- Agree

Comments:

We agree that the Licence should be considered as a higher power and hold authority over the Gas Network Code (GNC) and the proposed code text accurately reflects the policy decisions outlined within the associated documentation.

The Authority should ensure that the GNC is self-explanatory and consistent with the Licence to minimise the need for Users to have to cross reference between the Licence and Network code and therefore improve the useability and overall transparency of the GNC and Licence arrangements.

We understand that the use of “promptly” within A2.4 is a recognised legal term, however, in the interest of talking in plain and clear language, the Authority should consider using a specific measurable time period.

We believe the Authorities position on the ownership of issues that is outlined in A2.87 does not factor in the considerations such as reduced capacity or limitations in the required knowledge to take on ownership of the issue. In the absence of these, it may not be appropriate to express an interest and take ownership. In this scenario, it does not suggest there is a “lack of interest” as described within the policy decision document. Further comments will be provided on this later within the consultation where section A5 is discussed.

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

- Agree

Comments:

We agree that the proposed text reflects the policy decision set out in the main document.

Further clarity is needed within the text to fully explain that the Pre-Modification Forum is not a requirement but an option. In some instances, the proposed text implies that all Issues will be discussed at the Pre-Modification stage.

Additionally, we consider that additional clarity is needed from the Authority on the timeline that is required for SAF members to read and digest information that is circulated by the Code Manager in advance of the meetings. Currently the proposed wording does not outline a minimum time period that SAF members will have to review the information relevant to the meeting.

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

- Agree

Comments:

We agree the proposed text reflects the policy decision are pleased that a central change register has been taken forwards and will be maintained by the Code Manager. Additional clarity is required to provide assurance to the industry that the change register is going to be maintained and appropriately updated. The proposed wording confirms it will be “updated at regular intervals”, we consider this to be vague. We suggest the Authority includes a more specific timebound measurement would be more appropriate and will help to ensure the industry are able to view accurate information related to Modifications and Issues whilst encouraging accountability of the Code Manager and their processes.

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

- Agree

Comments:

We agree the proposed code text reflects the policy decisions.

However, we consider the rationale that has been provided for the policy decision within the main document to be lacking in relation to the scenario where no party comes forward to take ownership of an Issue or Modification proposal and as a result the Authority suggests there is a “lack of interest”. We believe there is a scenario where a party is interested, but does not have the capacity or they have knowledge gaps which prevent them from taking ownership. This does not appear to have been considered by the Authority. We suggest this is revisited and revised to appropriately address this feedback.

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

- Agree

Comments:

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

- Agree

Comments:

As previously stated in our response to the Second consultation on the implementation of the energy code reform – response template in 2025, we are supportive of having a pre-Modification process.

We consider the text requires additional refinement as the use of “all” within A7.1 suggests that a Pre-Modification is mandatory for some Modifications.

We note A7.18 states “The Code Manager must make every effort to ensure the Pre-Modification Forum is representative of all parties impacted by the issue being discussed”. We would like additional clarity on what the Authority consider the activities are to ensure representation and what would the next steps would be if adequate representation or quoracy is not achieved. We consider the wording used by the Authority in the proposed text to be atypical and therefore it may be more appropriate for use “reasonable endeavours” or “best endeavours”.

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

- Agree

Comments:

We broadly agree with the proposed text reflects the policy that has been provided. However, additional clarity is required across several points.

We disagree that the Code Manager should be making an assessment on the Modification Proposal at this early stage as to whether it is has a reasonable prospect of being approved or not. We believe that each Modification should have an opportunity to be discussed with industry to enable a full opportunity to articulate the change, its benefits and impacts on relevant parties. The Code Manager is unlikely to be an expert across all aspects of the industry nor will they fully understand all of the benefits that some changes could bring to the industry, consumers and GB PLC. This is likely to be especially true in regards to very specialised topics and areas of technology innovation which may impact the codes.

We consider that section A8.10 could be successfully mitigated if the Code Manager was to complete their “critical friend” process effectively and therefore, issues with Modification Proposals would be addressed before submission and therefore rejections would be extremely rare.

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

- Agree

Comments:

We agree that the proposed text reflects the policy decisions. However, we would appreciate additional context and clarification on:

The process where the Code Manager and SAF disagree. We note that within 2.113 of the policy document you state “A degree of disagreement between the code manager and SAF need not necessarily represent a concern as it can be a sign of a healthy, well-functioning system with a range of views represented”. We agree that disagreement and challenge are part of a healthy debate which will be key to the Code Manager’s role and duties under their proposed licence conditions. However, we consider that more information is required from the Authority on this topic and what process or steps are available if there are regular and material disagreements.

We would also like to understand if the Authority has considered service level agreements or proposed timelines in the event of appeals being lodged on the Code Managers decision associated to the Modification Path. The proposed text confirms that the Authority will provide an outcome but does not provide any additional information on when this will likely be provided. Our concern is that any material delays at this stage could result in the Modification becoming less impactful or beneficial to the industry or consumers.

We have concerns associated to the “authority led” Modifications and how they will be developed, reviewed, approved and implemented. With them being led by the Authority, there is a risk that they do not consider or fully develop the solution with industry nor go through a robust challenge and review process. Additionally, the Authority-led Modifications do not need to meet the assessment criteria set out in A8.9 and A8.10 which may introduce insufficiently developed or poor quality Modification proposals that are not aligned to the Relevant Objects. Additionally, we would like to understand more around the approval process of an Authority-led Modification because there are potentially risks associated to the Authority leading and approving a Modification. We request the Authority provides additional information on this process and when they are likely to use it.

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

- Agree

Comments:

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

- Agree

Comments:

We agree the proposed text reflects the policy decision. However, we believe the Authority should give further consideration to A11.4 which states “Where the Code Manager has decided that a Modification Proposal should enter the Workgroup Process the Code Manager must support the Proposer to develop the Modification Proposal ahead of the Workgroup”. Under the current proposals which allow additional parties to raise Modifications, this could present a significant resource requirement from the Code Manager to ensure it is done effectively and consistently across market participants to ensure the Code Manager is able to avoid undue discrimination or preferential treatment.

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

- Agree

Comments:

We broadly agree with the proposed text. However, we require additional clarity on several points of the code text.

A12.5 confirms the Code Manager must publish a summary of the discussion and outcomes from the Working Groups – We would expect there to be clear SLA's or publishing timelines within the text.

A12.10 & 11 provides an overview of the Workgroup Member and the Observer status. We consider there is a scenario where a party disagrees with the Code Managers determination of "Observer" status and as a result may have less influence over signing off the workgroup report or could be removed from the Workgroup by the Code Manager if they are deemed to have a negative impact on the Workgroup. There does not appear to be an appeals process documented within the proposed text. We consider this is something the Authority should revisit to ensure there clear and transparent processes for the Code Manager and potentially an appeals process.

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

- Agree

Comments:

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

- Agree

Comments:

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

- Agree

Comments:

We agree the proposed text reflects the policy decision. However, we disagree with a number of decisions.

2.183 of the policy document states that alternatives must be sufficiently different in outcome from the original proposal and from either other. We believe that consideration should also be given for how the solution is achieved eg what are the impacts on Users, Consumers, environment etc. There could be multiple ways of achieving the same outcome but via a different process or methodology.

Additionally, we have concerns with the Code Manager being able to combine proposals and their ability to “instruct the workgroup, other code parties or the proposer to develop multiple approaches into a single alternative” as outlined in 2.187 of the policy document. We would like to highlight that this would be a better proposal in the eyes of the Code Manager. Whereas others may consider it to be sub-optimal or less effective than other stand alone Modifications.

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

- Agree

Comments:

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

- Don't know/no view

Comments:

Significant Code Reform is not covered within the main document. However, the proposed text appears to be logical.

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

Don't know/no view

Comments:

Authority Led Modifications are not covered within the main policy document. As we have outlined in section A9 of this consultation, we have some concerns associated to the process of authority led Modifications and require additional information on how they would work and in what circumstances they would be utilised by the Authority. Please see below for more information on our response to A9 that is relevant to this question:

We have concerns associated to the “authority led” Modifications and how they will be developed, reviewed, approved and implemented. With them being led by the Authority, there is a risk that they do not consider or fully develop the solution with industry nor go through a robust challenge and review process. Additionally, the Authority-led Modifications do not need to meet the assessment criteria set out in A8.9 and A8.10 which may introduce insufficiently developed or poor quality Modification proposals that are not aligned to the Relevant Objects. Additionally, we would like to understand more around the approval process of an Authority-led Modification because there are potentially risks associated to the Authority leading and approving a Modification. We request the Authority provides additional information on this process and when they are likely to use it.

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

- Agree

Comments:

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

- Agree

Comments:

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

- Agree

Comments:

The Lead Code Manager should be required to demonstrate they have taken into account the consequential changes and especially the timeline that may be required to deliver the changes to the consequential code. They should evidence their thinking associated to the workload of the code participants, Code Manager and other interested parties that is required to deliver the changes in a robust manner.

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

- Agree

Comments:

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

Comments:

No comment. We are not a signatory to the BSC or REC Codes and are not best placed to answer this question.

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?

- Agree

Comments:

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

- Agree

Comments:

As outlined in our earlier consultation response, we believe as National Gas Transmission are the sole System Operator and owner of the National Transmission System (NTS) for GB, that we are uniquely positioned and have a vast amount of experience and expertise that could be extremely useful for the SAF. Therefore, we believe there should be substantive roles available to such organisations as National Gas Transmission. Another unique organisation for the gas industry that should be considered as having a substantive role on the SAF is the CDSP as they are central to change across the industry.

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

- Agree

Comments:

As outlined in our earlier consultation response and to section B4 - we believe as National Gas Transmission are the sole System Operator and owner of the National Transmission System (NTS) for GB, that we are uniquely positioned and have a vast amount of experience and expertise that could be extremely useful for the SAF. Therefore, we believe there should be substantive roles available to such organisations as National Gas Transmission.

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

- Agree

Comments:

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

- Agree

Comments:

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

- Agree

Comments:

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

- Agree

Comments:

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

- Agree

Comments:

As outlined in our earlier consultation response and to section B4 and B5 - we believe as National Gas Transmission are the sole System Operator and owner of the National Transmission System (NTS) for GB, that we are uniquely positioned and have a vast amount of experience and expertise that could be extremely useful for the SAF. Therefore, we believe there should be substantive roles available to such organisations as National Gas .

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

- Agree

Comments:

We consider that the code should provide a time bound measurement for how when the SAF are required to issue the minutes and outcomes from relevant meetings. This will provide transparency and encourage accountability from the members, chair and secretary.

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

- Agree

Comments:

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

Comments:

No comment. We are not a signatory to the BSC or REC Codes and are not best placed to answer this question.

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

Comments:

No view on this. The current arrangements of Panel have worked successfully, and we do not have any concerns regarding conflict of interest.

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?	it would have been helpful to have all the necessary documentation (current and previous) in one location and if all the necessary topics were outlined in the provided documentation.

Do you have any comments about its tone and content?	
Was it easy to read and understand? Or could it have been better written?	
Were its conclusions balanced?	
Did it make reasoned recommendations for improvement?	
Any further comments?	

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.