

# Consultation name: Implementation of the energy code reform: template code text

*Issued by:* Ofgem

*Territorial extent:* Great Britain

*Response author:* SGN

*Deadline for responding:* 17<sup>th</sup> April 2026



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Via email to: [industrycodes@ofgem.gov.uk](mailto:industrycodes@ofgem.gov.uk)

16<sup>th</sup> April 2026

## **Implementation of the energy code reform: template code text**

Thank you for the opportunity to respond to the above consultation<sup>1</sup>.

The below response to the questions posed follows on from the previous engagement provided by SGN to Ofgem's ongoing Energy Code Reform consultations.

Should you wish to discuss further, please do not hesitate to contact me at [Sally.Hardman@SGN.co.uk](mailto:Sally.Hardman@SGN.co.uk).

Yours faithfully,

Sally Hardman

**Regulatory Process Manager**

**SGN**

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<sup>1</sup> [Implementation of energy code reform: template code text](#)

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## Consultation on competitive code manager selection – response template

### Template part 1: Your organisation's details:

|                                                                                                                                                                                     |                             |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|
| Contact name                                                                                                                                                                        | Sally Hardman               |
| Role title                                                                                                                                                                          | Regulatory Process Manager  |
| Company name                                                                                                                                                                        | SGN                         |
| Telephone number                                                                                                                                                                    |                             |
| Email address                                                                                                                                                                       | sally.hardman@sgn.co.uk     |
| Date of submission                                                                                                                                                                  | 16 <sup>th</sup> April 2026 |
| Do you want your response treated as confidential?<br><br>(If yes, please indicate whether you would like the whole of your response to be confidential, or just particular parts). | No                          |

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## 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 are comfortable that the proposed text reflects the policy decisions. SGN's understanding is that any Gas Transporter Licence obligations in relation to Code Management will fall away upon implementation of the Gas Network Code Manager.

Other than the mention of ownership of legal text being retained by the proposer in A2.12 which could be any Code Party or Non-Code Party. There is no indication within the Code Modification Text who is responsible for the production of legal text.

**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: No comments.

**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: No comments.

**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: No comments.

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**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: No 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?

- Neither agree nor disagree

Comments: In our opinion the code text does not describe the process of raising a pre-modification but that of an issue to be investigated. The existing pre-modification process in the Uniform Network Code (UNC) provides The Proposer with the opportunity to develop a Modification Proposal.

REC currently provide the ability to raise an issue to be explored/developed prior to a Modification Proposal as does the UNC Review process therefore the inclusion of both processes would facilitate greater opportunities for Industry Parties to engage with the Code Manager.

**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: No comments.

**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: No comments.

**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: No comments.

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**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: No comments.

**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: No comments.

**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: No 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: No 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?

- Disagree

Comments: Under A15.2 the code text indicates that only the Code Manager or the Workgroup have the ability to raise an alternate modification. However, A15.2 appears to contradict both A15.8 and A15.9 which indicate other code parties are able to raise alternate modifications of which we would be supportive.

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**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: No 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?

- Agree

Comments: No comments.

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

- Agree

Comments: No comments.

**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: No 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: No 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: No comments.

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**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: No 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: None

### 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: No 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?

- Neither agree nor disagree

Comments: Under B4.2 clarifying text is required to indicate the intention of the restriction of a single office i.e. under another code or within the same code.

**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: No comments.

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

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- Agree

Comments: No 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: No 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: No 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: No 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: No comments.

**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: No comments.

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

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- Agree

Comments: No 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 comments.

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

Comments: No comments.

### 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?  |          |
| 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?                                                     |          |