
This document provides a template for responses to our new consultation questions on **Implementation of the energy code of practice provisions.**

decision – response template

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.

Contact name	Richard Pomroy
Role title	Regulation Manager
Company name	Wale & West Utilities
Telephone number	07812 973337
Email address	Richard.pomroy@wwutilities.co.uk
Date of submission	17 th 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

Template part 2: Code text consultation responses

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]

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know/no view

Comments:

Our understanding is that this text will form the code modification rules for the Gas Network Code following the appointment of the Code Manager. Gas Transporters currently have a licence conditions relating to the network code and modification rules. For WWU this is Standard Special Condition A11 "Network Code and Uniform Network Code". This condition will need to cease to have effect on the date that this text comes into effect otherwise we will be in breach of Standard Special Condition A11.

Heading and A2.5 – since A2.5a refers to Modification Procedures shouldn't the document itself be called Modification Procedures noting that this is a defined term in the Code Manager licence

A2.12 - Where the CM takes ownership in A2.10 does this mean they become the Proposer? Although this is dealt with in A5.2 it would be helpful to reference that in A2.10.

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]

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know/no view

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?

[Please delete all but one bullet]

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know/no view

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?

[Please delete all but one bullet]

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know/no view

Comments:

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]

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know/no view

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?

[Please delete all but one bullet]

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know/no view

Comments:

A7 Pre-modification process – This section describes a process for raising an issue not a pre-modification process. A pre-modification process should cater for the case where the the solution is clear in the eyes of the proposer and they want to flag that they are developing a Modification Proposal. We think that both processes have benefits and would be keen for both to be recognised. The equivalent to a REC Issue is the UNC Review process.

A7.1 – Delete “all” or replace with “any” as otherwise it implies that it is mandatory for some Mandatory Proposals when what it is trying to state is that it is not mandatory for any Modification Proposals but that it may be used.

General comment – In the REC issue process we have experience of the Code Manager taking a narrow view of the problem that an issue is trying to resolve and this translates into ~~a poor~~sub-optimal solutions. The issue process should consider all options, we realise that this takes more time but helps prevent sub-optimal solutions being implemented. We have a specific example to illustrate our concerns that we will share if requested.

The REC process is also quite opaque in that an issue ~~isare~~ raised and then a REC Change is raised following that process with little or no~~w~~ engagement between the close of the Issue and the Change being raised and progressed. The SAF should have a role between the two.

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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]

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know/no view

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?

[Please delete all but one bullet]

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know/no view

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?

[Please delete all but one bullet]

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know/no view

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?

[Please delete all but one bullet]

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know/no view

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?

[Please delete all but one bullet]

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know/no view

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?

[Please delete all but one bullet]

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know/no view

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?

[Please delete all but one bullet]

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know/no view

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?

[Please delete all but one bullet]

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know/no view

Comments:

A15.8 - Clarify that it is a better proposal in the opinion of the Code Manager. Suggest adding “ , in the opinion of the Code Manager,” after “better proposal”. The sentence would then read “The Code Manager can combine suggested Alternative Modification Proposals if it determines that they are sufficiently similar or produce a better proposal, **in the opinion of the Code Manager**, once combined.

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]

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know/no view

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?

[Please delete all but one bullet]

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know/no view

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?

[Please delete all but one bullet]

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Don't know/no view

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?

[Please delete all but one bullet]

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know/no view

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?

[Please delete all but one bullet]

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know/no view

Comments:

A20.1 - This tells the the Code Manager to modify the Code once a modification has been approved; however, A20.2 refers to an implementation timetable. The text needs to be clear that the Code is modified in accordance with the implementation timetable so that the Code is amended when any necessary system or process changes have been implemented by parties.

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]

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know/no view

Comments:

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]

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know/no view

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:

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?

Consultation section 3: Stakeholder Advisory Forum (SAF)

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]

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know/no view

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?

[Please delete all but one bullet]

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know/no view

Comments:

B4.2 – is the restriction on SAF membership meant to apply to a SAF member being a member of the SAF for another code? If so we suggest the wording is amended to specifically refer to not being a member of another code's SAF.

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]

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know/no view

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?

[Please delete all but one bullet]

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know/no view

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?

[Please delete all but one bullet]

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know/no view

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?

[Please delete all but one bullet]

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know/no view

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?

[Please delete all but one bullet]

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know/no view

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?

[Please delete all but one bullet]

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know/no view

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?

[Please delete all but one bullet]

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know/no view

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?

[Please delete all but one bullet]

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know/no view

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:

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

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?	

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, **Your response, data and confidentiality** 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.