
Energy code reform – statutory consultation on modifications to the Retail Energy Code and affected licences - response template

This document provides a template for responses to our statutory consultation on modifications to the Retail Energy Code and affected licences, published on 4 September 2026.

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 16 October 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 company’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 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	
Role title	
Company name	
Telephone number	
Email address	
Date of submission	
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).	

Template part 2: consultation responses

Part 1: Part One: Proposed changes to the Retail Energy Code (REC)

Question 1: Do you agree that the drafting in the relevant annexes appropriately reflects the proposed changes to clarify RECCo's accountability as the licensed code manager and remove code provisions that are no longer applicable?

[Please delete all but one bullet]

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

Comments:

Question 2: Do you agree that the drafting in clause 1.7 of schedule 1 as set out in Annex B appropriately reflects the proposed change to clarify that RECCo’s activities and responsibilities under the code are subject to the requirements of the code manager licence?

[Please delete all but one bullet]

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

Comments:

Question 3: Do you agree that the proposed amendments to the Final code modification template text, as set out in annex E, deliver the intent of our proposed policy?

[Please delete all but one bullet]

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

Comments:

Question 4: Do you agree that the proposed amendments to the Final stakeholder advisory forum template text, as set out in Annex AG, deliver the intent of our proposed policy?

[Please delete all but one bullet]

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

Comments:

Question 5: Do you agree with our proposed approach to transitioning to the SAF, as set out in Annex AG at paragraph 13?

[Please delete all but one bullet]

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

Comments:

Question 6: Do you agree that the proposed REC amendments set out in annex A, reflects our policy position that all identified activities undertaken by RECCo under, or in connection with, the REC should form part of its code manager business?

[Please delete all but one bullet]

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

Comments:

Question 7: Do you agree that the drafting in clause 15 of annex A accurately reflects the proposed changes to clarify that RECCo must comply with both the performance requirements set out in the licence and existing code obligations relating to performance assurance?

[Please delete all but one bullet]

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

Comments:

Question 8: Do you agree that the drafting in clauses 5.6 and 5.10 of annex A, and clauses 8.1 and 8.2 of annex D, accurately reflect the proposed changes to align the code with the requirements in the licence and remove code provisions that are no longer applicable?

[Please delete all but one bullet]

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

Comments:

Question 9: Do you agree that changing references to the 'REC Board' to the 'RECCo Board' throughout the code accurately reflects the proposed change to improve clarity and consistency of the governance arrangements within the code?

[Please delete all but one bullet]

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

Comments:

Question 10: Do you agree that the drafting in clauses 9.21 and 9.23 of annex A and clauses 8.3-8.5 of annex D accurately reflect the proposed changes to align the REC's annual reporting, financial reporting, planning and assurance arrangements with the code manager licence and reduce duplication between the REC and the licence?

[Please delete all but one bullet]

- Strongly agree
- Agree
- Neither agree nor disagree

- Disagree
- Strongly disagree
- Don't know/no view

Comments:

Question 11: Do you agree that the drafting in clause 8.3 of annex D accurately reflects the proposed change to clarify the matters requiring approval by the RECCo board?

[Please delete all but one bullet]

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

Comments:

Question 12: Do you agree that the drafting in clause 8.6 of annex D accurately reflects the proposed change to clarify the circumstances in which RECCo may delegate operational decisions, and the matters that must remain reserved to the RECCo board?

[Please delete all but one bullet]

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

Comments:

Question 13: Do you agree that the drafting in clause 9 of annex A accurately reflects the proposed changes to align the code arrangements on the budget and planning processes, and the budget appeals process with the requirements in the code manager licence?

[Please delete all but one bullet]

- Strongly agree
- Agree

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

Comments:

Question 14: Do you agree that the drafting in clause 9.6 of annex A accurately reflects the proposed changes to ensure the code manager objectives are appropriately reflected in the annual budget process?

[Please delete all but one bullet]

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

Comments:

Question 15: Do you agree that the drafting in clause 9.7 of annex A accurately reflects the proposed change to encourage earlier engagement before budget appeals are raised?

[Please delete all but one bullet]

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

Comments:

Question 16: Do you agree that the drafting in clause 5.4 of annex A accurately reflect the proposed changes to ensure that the code manager objectives are appropriately reflected in the code?

[Please delete all but one bullet]

- Strongly agree
- Agree
- Neither agree nor disagree

- Disagree
- Strongly disagree
- Don't know/no view

Comments:

Question 17: Do you agree that the drafting included in clauses 9 and 10 of annex A, annex D and annex J accurately reflect the proposed change to align the code arrangements related to cost recovery, including terminology, with the requirements and language in the code manager licence?

[Please delete all but one bullet]

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

Comments:

Question 18: Do you agree that the drafting included in clause 2.3, schedule 10 of annex J and schedule 1 of annex B accurately reflects the proposed changes to clarify how the cost recovery methodology and cost recovery statement interact with the requirements in the code manager licence, including the proposed transitional arrangements?

[Please delete all but one bullet]

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

Comments:

Question 19: Do you agree that the drafting included in clause 9.4 in annex A accurately reflects the proposed change to expand the costs that RECCo can recover to include those incurred in carrying out licensed code manager activities and other costs recoverable under the licence?

[Please delete all but one bullet]

- Strongly agree
- Agree
- Neither agree nor disagree

- Disagree
- Strongly disagree
- Don't know/no view

Comments:

Question 20: Do you agree that the drafting included in schedule 10 of annex J accurately reflects the proposed change to align the code with licence requirements related to core charges?

[Please delete all but one bullet]

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

Comments:

Question 21: Do you agree that the drafting included in schedule 10 of annex J accurately reflects the proposed change to align the code with licence requirements related to usage-based charges?

[Please delete all but one bullet]

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

Comments:

Question 22: Do you agree that the drafting in clause 9.1 of annex D accurately reflects the proposed change to align code arrangements with the not-for-profit licence requirement, and to clarify how surplus amounts related to licensed activities should be treated?

[Please delete all but one bullet]

- Strongly agree

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

Comments:

Question 23: Do you agree that the drafting in clause 4.1 of annex D accurately reflects the proposed changes to align the activities that RECCo can undertake, and restrict the actions of shareholders in line with the requirements of the code manager licence?

[Please delete all but one bullet]

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

Comments:

Question 24: Do you agree with the proposed consequential changes to main body, clause 6 as set out in Annex A to modify delegated authority arrangements for REC sub-committees?

[Please delete all but one bullet]

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

Comments:

Question 25: Do you agree with the proposed changes to distinguish between REC Governance Bodies and Sub-committees?

[Please delete all but one bullet]

- Strongly agree
- Agree

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

Comments:

Question 26: Do you agree with the proposed drafting, including classifying the REC Performance Assurance Board as a REC Governance Body rather than a sub-committee, as reflected in the proposed amendments to clause 6 of the REC main body in Annex A and schedule 6 in Annex F (including clauses 2.3 to 2.5)?

[Please delete all but one bullet]

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

Comments:

Question 27: Do you agree with the proposed amendments to section 15 and section 16 of the REC main body, schedule 6, schedule 9, and schedule 12, which are intended to align the REC with the new REC Governance Body model, clarify the respective roles of the REC PAB, RECCo and the RECCo Board, and update related governance and decision-making arrangements?

[Please delete all but one bullet]

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

Comments:

Question 28: Do you agree with the proposed insertion to schedule 11 of clause 9.6A in Annex K relating to unresolved disputes concerning prepayment transactions on the Multiple Supplier Report?

[Please delete all but one bullet]

- Strongly agree

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

Comments:

Question 29: Do you agree with the proposed consequential changes to main body, clause 23 of Annex A in relation to code derogations?

[Please delete all but one bullet]

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

Comments:

Question 30: Do you agree with the proposed clarifications relating to code derogations vs. modification proposals?

[Please delete all but one bullet]

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

Comments:

Question 31: Do you agree that the proposed drafting in clause 24.5, schedule 5 of annex E accurately reflects the proposed change to mirror an existing obligation in the DTSA on the responsible body for the DTS to deliver changes to the DTS that are required to support approved REC modifications in accordance with the REC change process?

[Please delete all but one bullet]

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree

- Strongly disagree
- Don't know/no view

Comments:

Part 2: Proposed changes to affected licences

Question 32: Do you agree that the proposed modifications to the annex AL electricity supply and annex AN gas supply standard licence conditions appropriately reflect the transition to the new code manager framework, while retaining necessary obligations on relevant licensees as REC parties?

[Please delete all but one bullet]

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

Comments:

Question 33: Do you agree that the proposed amendments to the definition of the REC in the affected licences contained in annexes AN, AI, AJ, AK, AL, AO, AP appropriately reflect its designation under section 182 of the Energy Act 2023 and the transition to the new code manager framework

[Please delete all but one bullet]

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

Comments:

Question 34: Do you agree with the proposed drafting for a new principles-based standard licence condition requiring cooperation on code modifications related to SDS, for all gas and electricity licences, included in Annex AJ?

[Please delete all but one bullet]

- Strongly agree
- Agree

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

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?	

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.