
Consultation on the draft second preliminary Strategic Direction Statement – response template

This document provides a template for responses to our consultation on the second preliminary Strategic Direction Statement, published on 2 April 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 Thursday 28 May 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	Natasha Ranatunga
Role title	Senior Manager
Company name	EDF Energy
Telephone number	07875112981
Email address	Natasha.Ranatunga@edfenergy.com
Date of submission	22 May 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
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Template part 2: consultation responses

Consultation section 2 – Approach to the Strategic Direction Statement

Question 1 – On the basis that the SDS should contain a strategic assessment of government policies and developments relating to the energy sector, that will or may require the making of code modifications, do you think there is anything missing from the SDS that you would expect to require code modifications in the next 1-5 years? If so, please specify.

- Yes

Comments:

We would welcome greater detail on how consumer flexibility, and specifically the market around load control of Energy Smart Appliances, will work in practice. When the load control licence is in place, consumers will be able to contract with load controllers and change who their load controller is at the end of a contract. Further clarity is needed on the processes that will be developed to enable this 'switching' process to work effectively.

As it is nominally similar to the process for switching supplier, the REC may be best placed to set this out rather than the BSC. The BSC is not an appropriate code for managing consumer facing processes as it is really a technical code. The Elexon FMAR might be the place where that asset level registration data is maintained, but the rules about how it gets updated to show who the current load controller is would be better placed in the REC.

Question 2 – Do you agree with the classification of each policy area within the three time horizons (Act now, Think & plan, Listen & wait)? If not, please specify what changes you suggest and why.

- Agree

Comments:

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Question 3 – Do you find the SDS easy to understand and do you think that the level of detail included is sufficient to allow you to begin raising and implementing code modifications, where appropriate?

- Yes

Comments:

Overall, the SDS is a useful (if quite long) summary of the various government policies and developments and the actions that are planned to be taken over the next few years, setting out what is going to be done, why, and who by. Alongside the Forward Work Programme, it could provide useful guide to where we need to focus our efforts in the coming year(s).

Generally, the approach set out should make it easier to engage with code changes as processes are aligned across codes, expected better clarity on processes and contact points.

Question 4 – Do you support our proposed approach to convert the SDS from a preliminary document to a hybrid document, following designation of the BSC and the REC?

- Yes

Comments:

Question 5 - Do you have any other feedback?

Comments:

We believe that the accompanying summary spreadsheet is a useful tool and could be tweaked to be more user friendly – we are happy to discuss this further with you.

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?	N/a

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Do you have any comments about its tone and content?	N/a
Was it easy to read and understand? Or could it have been better written?	Quite lengthy and not an easy document to navigate – the accompanying spreadsheet helps.
Were its conclusions balanced?	n/a
Did it make reasoned recommendations for improvement?	n/a
Any further comments?	n/a

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 3.

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

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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.