
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	Mr Karl Maryon
Role title	Chair of DCUSA
Company name	DCUSA Limited
Telephone number	020 7432 3011
Email address	dcusa@electralink.co.uk
Date of submission	27 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, we are happy for our responses to be openly shared.
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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.

- Don't know/no view

Comments: We cannot honestly answer this question with 100% certainty of whether anything is missing from the SDS that we would expect to require code modifications in the next 1-5 years. From our reading and general understanding we are comfortable with the suite of known and potential code changes that may be required, there is nothing that we can think of that may be missing.

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: Yes, our position and support for this pragmatic and logical use of time horizons is unchanged from SDS1. A very useful classification to assist in prioritisation and planning.

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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: In general yes, however it is evident that different authors are used for the different policy areas and some are better at clearly communicating next steps, and who need to take those steps, than others. We believe it would be very useful if specific named Ofgem personnel are included within the SDS document to enable swift contact with the relevant responsible owners to progress any queries.

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: Yes, this is pragmatic and proportionate approach and keeps everything under one document for ease of reference.

Question 5 - Do you have any other feedback?

Comments: The supporting spreadsheet is very useful, thank you. As an observation, we would like to see more flexibility in the overall process to allow for new emerging urgent issues to be included within a current year.

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?	No, is in keeping with the usual process.
Do you have any comments about its tone and content?	Very thorough, well thought through with most next steps clear. General progress updates appreciated.
Was it easy to read and understand? Or could it have been better written?	In general yes, especially considering we recognise multiple authors would have been used so always a challenge maintaining a 'house style'.
Were its conclusions balanced?	Yes.
Did it make reasoned recommendations for improvement?	Yes.
Any further comments?	No, thank you for the opportunity to feedback.

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

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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 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.