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Energy Code Governance Reform
Office of Gas and Electricity Markets
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27th May 2026

Dear Annie,

Wales & West Utilities (WWU) response to Ofgem Consultation on the draft second preliminary Strategic Direction Statement

Thank you for the opportunity to respond to this consultation. WWU is a gas transporter and a regional gas distribution network ("GDN"), serving 2.6 million supply points in Wales and south-west England.

Q1. 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.

Our view is that the draft second preliminary SDS assesses government policy against code change well and we do not believe there is anything missing.

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

Our view is that the three-time horizons have been accurately applied and are correct for the codes that we assessed that WWU are interested in, namely the UNC, IGT UNC, REC and SEC.

Wales & West Utilities Limited

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Q3. 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?

The length of the SDS and the various of subsidiary documents makes the SDS difficult to engage with at first. The inclusion of the SDS tracker spreadsheet helped to navigate the material and simplified what would otherwise have been a difficult task.

Q4. 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, a hybrid SDS document is logical to formalise the SDS for the first designated codes and for delivery by their respective code managers under the code manager licence rather than creating two SDS documents, which is inefficient.

Q5. Do you have any other feedback?

We agree with the roles and responsibilities detailed within the SDS 2 in terms of delivery of government policy into code. We note that SDS 2 will be live whilst non-designated codes are transitioning away from legacy arrangements. During this transition there will be a period of reduced activity while the respective new code managers are being established.

Yours sincerely



Tom Stuart
Regulation Analyst
Wales & West Utilities