
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	Kevin Clark
Role title	Market Transformation Senior Analyst
Company name	Utilita Energy Ltd
Telephone number	
Email address	kevinclark@utilita.co.uk
Date of submission	28-May-26

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.

[Please delete all but one bullet]

- No

Comments:

We believe that the document captures the known current developments.

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.

[Please delete all but one bullet]

- Strongly disagree

Comments:

We note Ofgem’s commitment to tackling the affordability crisis, however, would urge this programme of work to be brought forward, as the bulk of it is still within the “Think & Plan” horizon. This pushes back implementing measures to tackle consumer bills and provide support to the 2028/29 financial year, allowing vulnerable customers to continue building debt. There is significant industry support in preventing this from happening and better supporting these customers.

Therefore, we suggest that the following objectives be brought forward into the “Act Now” horizon:

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- 1.2: Work with others to tackle the affordability crisis
- 2.1: Improve protections for all consumers, particularly those in vulnerable situations

In particular, the work on improving the Priority Services Register should be prioritised alongside protections for customers in those vulnerable situations. The PSR is currently not fit for purpose and can lead to uncertainty around which customers should be included in schemes and initiatives, such as the new bill support scheme currently being developed – a revamped PSR would make identifying which customers should receive support under this scheme more intuitive and ensure the customers who need it most receive the support needed.

Additionally, we note that many objectives within the “Act Now” horizon are focused on network initiatives and infrastructure, many of which will add additional costs to consumer bills. This contradicts the need to tackle affordability, and greater thought should be given to how these costs are allocated and recovered – Suppliers should not continue to be used to gather funds for network parties simply because it is convenient.

We would also have expected that this Strategic Direction Statement be weighted towards the codes being designated during Phase 1 of code reform, focusing more on objectives that could be delivered by the REC and BSC, with future annual Strategic Direction Statements broadening this focus to include the Phase 2 and then Phase 3 codes when they become appropriate – although we do appreciate the more holistic view of Ofgem’s objectives, much of the SDS is focused in codes with no requirement to implement them.

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?

[Please delete all but one bullet]

- Yes

Comments:

The SDS is well written and provides appropriate detail on objectives within the “Act Now” and “Think & Plan” horizons. The horizons further out than this, understandably, have lesser detail, so we would expect these objectives to be fleshed out in future Statements.

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?

[Please delete all but one bullet]

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- Yes

Comments:

This approach makes sense given the timing of the code designations and prevents the SDS needing to be reissued mid-year.

Question 5 - Do you have any other feedback?

Comments: No further 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?	No comments
Do you have any comments about its tone and content?	No, the document is well written and provides enough detail for us to make meaningful contributions to the consultation questions.
Was it easy to read and understand? Or could it have been better written?	Yes, it was easy to read and understand
Were its conclusions balanced?	No comments
Did it make reasoned recommendations for improvement?	No comments
Any further comments?	No 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

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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 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.