Ofgem Consultation on Code Manager Standard Licence Changes: Data Best Practice

Citizens Advice response

citizens advice

September 2026

We support the Energy Code Reform programme which aims for consistency across code bodies, to promote faster and more efficient decision-making, and to better enable the energy transition as detailed within the Ofgem Strategic Direction Statement.

We support the drive to have Data Best Practice (DBP) Guidance requirements to be followed by Code Managers to ensure consistency across the various licensed energy bodies and to endeavour for high standards in managing and using data by Code Managers.

This response is not confidential and may be freely published.

Question 1

Do you agree with the structure of our proposed amendments to the Code Manager Standard Licence Conditions, to introduce the requirement to follow Data Best Practice (DBP) Guidance for licensed Code Managers?

We support the proposed amendments to require licensed Code Managers to follow DBP Guidance and to have the amendments within Code Manager Standard Licence Conditions rather than introduced via multiple code modifications. Using the Licence rather than the code itself will enable faster amendment if needed, and ensure ready consistency across the Codes and the other bodies that are required to comply, such as licensed network operators.

We agree with the timings to require Code Managers to publish Digitalisation Strategy within two years of licensing and then Action Plans on a following six-monthly cycle. We also agree that the DBP Guidance requirement should start as the Code Manager becomes licensed, although we are aware that many prospective Code Managers are already working on these documents.

We also agree with the requirement to follow Open Data Triage processes once DBP Guidance becomes a licence obligation.

Question 2

If you are a prospective Code Manager, do you currently follow DBP Guidance on a voluntary basis? If not, what are the key barriers preventing adoption (for example, data maturity, capability, resource constraints, legacy systems, or governance arrangements)?

N/A

Question 3

What forms of support, clarification, or guidance from Ofgem would help prospective Code Managers comply with the DBP obligation once it becomes a licence requirement? Please include examples of tools, documentation, or transitional arrangements that would be beneficial.

N/A

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Published September 2026.

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Registered charity number 279057.