

Guidance

This Excel spreadsheet provides a template for responses to our **consultation on the implementation of energy code reform** published on 30 January 2024.

There are three tabs for you to fill in:

- 'Organisation Details': general information about yourself, your organisation and questions around your response's confidentiality.
- 'Consultation Questions': a list of all the questions made throughout the consultation document on the left hand side with blank cells on the right hand side for you to fill with your responses. Please respond to each one as fully as you can.
- 'General feedback': an opportunity for you to give us feedback on the overall consultation process.

Please complete this spreadsheet and **send your response to industrycodes@ofgem.gov.uk by 23/04/2024.**

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

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Date of submission	
Do you want your response treated as confidential?	22/04/2024
Do you want part of your response treated as confidential?	No

No.	Question	Response
1	Do you agree that we should recommend to the Secretary of State that the 11 industry codes listed (including the SQSS) should be designated as “qualifying documents” for the purposes of using our transitional powers in the Energy Act 2023 to deliver energy code reform?	
2	Do you agree that we should recommend to the Secretary of State that the 5 central systems listed (including the Central Switching Service) should be designated as “qualifying central systems” for the purposes of using our transitional powers in the Energy Act 2023 to deliver energy code reform?	we agree with the recommendation to designate the five central systems as “qualifying systems”. It will be necessary for Ofgem to use their transitional powers as once codes become consolidated and amended central systems will likewise require modification.
3	Do you agree with the monetised costs and benefits set out in the accompanying draft impact assessment (ie the quantitative analysis)? Please specify if you think there is any further evidence that we should consider.	
4	Do you agree with the hard-to-monetise costs and benefits set out in the draft impact assessment (ie the qualitative analysis)? Please specify if you think there is any further evidence that we should consider.	
5	Do you agree with our preferred option to consolidate the CUSC and DCUSA to form a <u>unified electricity commercial code</u> ?	we disagree with the preferred option to consolidate the CUSC and DCUSA to form a unified electricity commercial code. This is due to our view that it remains unlikely that both codes can be amalgamated together to form a unified code without both codes
6	Do you agree with our preferred option to consolidate the Grid Code, STC, SQSS and Distribution Code to form a <u>unified electricity technical code</u> ?	we believe that this represents a more logical option than a unified electricity commercial code as we consider the codes being considered reflecting an easier and more natural consolidation. This would make consolidation a worthwhile process that could
7	Do you agree with our preferred option to consolidate the UNC and IGT UNC to form a new <u>unified gas network code</u> ?	we agree with the creation of a unified network gas code and believe it remains the more natural and viable option for code consolidation. This is due to the two codes being close in technical similarity which makes consolidation a more seamless transition.
8	Do you agree with our proposals to rationalise the identified code provisions as part of any consolidation exercise?	
9	Do you agree with our proposal to publish the first Strategic Direction Statement (SDS) for all codes next year (before code managers are in place)?	we can see the benefits of having a forward looking SDS for each code industry code published alongside Ofgem’s Forward Programme, as it will give increased certainty to the change process. However, often code modifications are needed as a
10	Do you have views on the proposed SDS process?	
11	Do you agree with our proposal that a principles-based standard condition for gas and electricity licensees would support the development and delivery of code modifications related to the SDS?	
12	Do you agree with our preferred option for how a Stakeholder Advisory Forum should be constituted?	we’re unsure of the benefits of the SAF and how it would be an improvement on the current panel structure in place for many codes. As has been seen with the REC, reducing industry oversight of code manager activities has resulted in an inefficient change

13	What are your views on i) a requirement to assess the greenhouse gas impact of code modifications with updated guidance, or, ii) introducing a 'net zero' code objective?	
14	Do you agree with our proposal to extend and harmonise the ability of code panels to prioritise the assessment of code modification proposals?	
15	Do you agree with our proposal to adopt a phased approach to transitioning codes to the new governance model?	We agree with the proposal to adopt a phased approach which represents the path of minimal disruption compared to the big bang, concurrent, and fully sequential approaches.
16	Do you identify any strategic or operational considerations that might inform the transition sequence?	
17	What are your views on our proposed transition sequencing?	
18	Do you have any other comments on how Ofgem should approach the implementation and transition process?	

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 these questions:

Question	Response
Do you have any comments about the overall process of this consultation?	
Do you have any comments about its tone and content?	
Was it easy to read and understand? Or could it have been better written?	
Were its conclusions balanced?	
Did it make reasoned recommendations for improvement?	
Any further comments?	