

Ofgem Data Best Practice as a Code Obligation consultation

Citizens Advice response



August 2025

This response is not confidential and may be freely published.

Questions

Section 2 – Intent behind the Proposed Changes

Q1. Do you agree with our intent to expand Data Best Practice (DBP) Guidance into the codes?

Yes, we agree with the intent to expand DBP Guidance into the energy codes. While many codes themselves tend not to hold or process large amounts of energy data, it is valuable to have consistency in approach across the codes. It will be useful to have the DBP Principles in mind for the code administrators, various Panels and sub-committees and in due course, for the code managers when undertaking their functions.

Q2. Do you agree with the proposed deadline six months after the licence condition is applied for consequential code modifications? If not, please state your reasons specific to the relevant code and modification process.

Yes, we agree with the proposed six month deadline. In the main, the types of data being held by codes do not warrant a more urgent timeline than that proposed.

Q3. Do you agree with the minded-to position that an obligation to produce Digitalisation Strategy and Action Plans (DSAPs) is suitable and proportionate for code bodies? If not, what alternative would you propose to achieve the same or greater benefits?

Yes, we agree with the obligation to produce a DSAP. Some code bodies are already producing DSAPs and it will focus attention on DBP Guidance regularly within each code when DSAPs are produced.

Section 3 – Licence Condition Changes by Code

Q4. to Q12. No response.

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