

Annex A: Additional detail on the code manager performance framework

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Section 1: Performance related metrics proposed not to be included

These metrics were proposed by stakeholders at the workgroup in September.

Proposed metric	Reasoning for not including
Measure quality of analysis in change reports.	Difficult to define a performance metric that would effectively capture this. Better addressed by question in stakeholder surveying.
Metric assessing how an implemented modification performed against the code objectives.	It will likely be difficult to assess whether a single modification has contributed to the furthering of a code objective given the high-level nature of these, and some of the benefits may be hard to quantify. Instead, we consider that there is scope for the code manager to explain this through narrative in the performance report.
Metric capturing cross-code cost comparisons (e.g. accommodation, headcount).	We do not consider this to be appropriate as a metric due to varying business models and organisational structures across the code managers, noting that scrutiny of budgets will provide some transparency on abnormalities or undue spending.
Metric capturing timely modification consultation and response to feedback.	We consider that the metric on code changes, alongside stakeholder survey questions on the topic, captures this. Difficult to draft a performance metric that is more specific than this, especially since ‘timely’ may be subjective.
Metric on how many SAF recommendations	This is part of the ‘code health’ metrics. We do not consider it appropriate to connect this to performance as it should not be seen as inherently good or bad to agree or not agree with the

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Proposed metric	Reasoning for not including
are accepted or rejected by CM.	SAF, and the code manager should be empowered to make independent decisions.
A code accessibility metric that could cover measures such as level of API accessibility, or whether information is unnecessarily held behind passwords.	We consider this best captured by stakeholder surveying and engagement.
Suggestion that there should be independent quality check of submitted modification reports and that the scoring of this goes toward a metric.	We consider that independent quality checks for each report may be unnecessarily costly and that it can be difficult to quantify what is considered a ‘high-quality’ report. The metric covering send-backs, alongside stakeholder surveying, should sufficiently capture any indication of the quality of modification reports not being good enough.
Metric capturing potential blockers in the pre-modification process due to code manager discretion.	Difficult to quantify and draft a performance related metric on what potential blockers could be, as there will be multiple considerations around what issues are converted. The code health metrics capture number of issues converted into modifications, and stakeholder engagement should capture any general dissatisfaction with the process and outcomes.
Metric measuring capital project performance	It is not clear if there is a metric that could be quantified consistently across the code managers, as projects may vary. Instead, there could be opportunities for the code manager to do post-implementation reviews and engagement.
Metric capturing budget contingency and ability to accurately forecast	Difficult to draft a metric on this which has consideration for contingency that may be there for valid purposes, and extraordinary circumstances. Any concerns around the budget should instead be captured through the consultation processes and general stakeholder engagement.

Section 2: ‘Code health’ metrics (non-performance related)

This is based on some initial suggestions from Elexon and RECCo on what sorts of measurements would be relevant, along with our own assessment.

Proposed metric	Notes
% new code parties during period compared to total code parties	
# issues raised to the code	‘Issue’ means an issue that a person has identified in relation to the relevant code that they consider warrants a modification to that code.
% new issues converted to modifications	
% modifications where code manager view of prioritisation aligned with majority SAF view	
# modifications raised to the code	
% new modifications raised by: - Code manager - Code party - Non-code party - Authority	
# code modifications raised by code manager in response to other code change (cross-code)	
% Modifications completing modification process (to submission of modification report or self-governance decision) within the code manager’s estimated modification progression timetable	
% Authority modification decisions received within the Authority estimated decision date	

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Proposed metric	Notes
Average time (in days) from modification raised to submission of mod report to Authority, for mods where the mod report was submitted to the Authority during the performance year. Split by modification proposer (code manager, code party, non-code party, Authority)	Days mean calendar days.
Average time (in days) from submission of mod report to Authority decision, for mods where the Authority made a decision during the performance year.	Days mean calendar days.
Average time (in days) from modification raised to implementation, for self-governance mods where the code manager made a decision during the performance year.	
% modifications implemented out of total raised	
% code manager recommendations on authority-consent modifications (including preference for alternatives) agreed by Authority	At the stakeholder workgroup this was presented as a performance-related metric. It was noted there could be a risk of the code manager being incentivised to make decisions they think Ofgem will agree with, rather than in the best interest of the code. Because of this, we propose that this should be a code health metric instead.
% code manager modification recommendations (including preference for alternatives) aligned with majority SAF view	
Average # consultation responses to Authority Consent modifications	
Average # consultation responses to Self-Governance modifications	

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Proposed metric	Notes
# code modifications raised by code manager with expressed outcome in delivering SDS 'Act Now' priorities	
The number of designation requests to the code manger from non-code parties who want to raise a mod for each code and the numbers who are accepted or declined.	For the phase 1 code managers, this would only apply to BSC as REC are keeping their current arrangements where anyone can raise a modification.
# ownership requests (split by issues and modifications) made to the code manager	
# ownership requests (split by issues and modifications) that are accepted or declined.	

Section 3: Areas/questions for proposed stakeholder engagement surveys

Below, we set out our proposal for what areas should be covered by each survey, with illustrative example questions provided for further clarity. This is based on some initial suggestions from Elexon and RECCo on what sorts of topics and/or questions would be relevant, along with our own assessment.

It is proposed that these would be the required areas across all the code managers, and that the code managers would have the opportunity to cover further questions and additional topics should it be helpful.

6-monthly SAF/PAB survey:

Required areas to be covered	Example questions
<p>Code management</p> <ul style="list-style-type: none"> - Acting in the best interest of the code - Acting in line with its code manager objectives - Clarity and transparency around decision making - Effective code governance processes Q1. 	<p>Level of agreement: I trust that the code manager is acting in the best interest of the industry and the code/code manager objectives.</p> <p>Level of agreement: I believe that the code manager is transparent about how decisions are made and by whom.</p>
<p>Change management</p> <ul style="list-style-type: none"> - Quality of code modification process, including impact assessments, reports and response to feedback - Timeliness and effectiveness of modification processes - Effective decision making 	<p>Level of agreement: I believe the code manager produces high-quality impact assessments and reports.</p> <p>Level of agreement: I believe the code manager produces modification consultations and responds to feedback in a timely manner.</p> <p>Level of agreement: I believe the code manager makes informed and independent decisions in the best interest of the code.</p>

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Cross-code coordination	Level of agreement: The code manager actively seeks input to determine cross-code impacts of modifications.
Code accessibility <ul style="list-style-type: none"> - Easy to understand the code and related documents, including their processes 	Level of agreement: The code and related documents are easy to understand. Level of agreement: I understand the relevant processes in the code and related documents when I need to participate and/or contribute to these.
Financial management and budget <ul style="list-style-type: none"> - Perception of budget and value for money - Perception of transparency and effective communication from the code manager 	Level of agreement: I believe the code manager effectively and transparently explains how costs translate to party services. Level of agreement: I believe the code manager effectively budgets and that costs are fair and reflective of the services provided.
Delivery plan & implementation	Level of agreement: I believe the code manager's delivery plan is ambitious yet achievable. Level of agreement: I believe the code manager has made good progress on delivering the commitments in its delivery plan over the past six months.
Performance management <ul style="list-style-type: none"> - Perception of code manager performance 	Level of agreement: I agree that the performance indicators provide an accurate view of CM performance. Level of agreement: Overall, I think the code manager performs its duties and obligations well.

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<p>Communication and stakeholder engagement</p>	<p>Level of agreement: I believe the code manager effectively engages with the SAF/PAB and other key stakeholders.</p> <p>Level of agreement: I believe the code manager takes stakeholders views into consideration in a proportionate and fair way.</p>
<p>Option for general comment</p>	<p>Opportunity to raise anything that has not been raised through the other questions.</p>

Events required to be covered by events-based surveys:

These would include numerical questions (1-10) + optional comment

<p>Required events to be covered</p>	<p>Example questions</p>
<p>Following becoming a party to the code</p>	<p>How easy and intuitive did you find the code accession process?’</p>
<p>Following a SAF/PAB or workgroup meeting the code manager has facilitated</p>	<p>How well did you think this meeting was managed?</p>
<p>Following a modification report</p>	<p>How clearly do you think the code manager explained their modification path and recommendation decisions?</p>
<p>Following modification recommendation/decision</p>	<p>To what extent do you agree that your views have been taken into account by the code manager in relation to a modification recommendation to Authority or self-governance implementation?</p>
<p>When budget and delivery plan are consulted on</p>	<p>To what extent do you agree that the code manager has produced a high-quality draft budget and draft delivery plan?</p>

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When final budget and delivery plan are published	To what extent do you agree that your views and comments on the draft budget and delivery plan have been taken into consideration?
Performance report publication	To what extent do you agree that the performance report provide an accurate view of CM performance?
Following publication of the cost recovery statement	To what extent to you think the cost recovery statement is easy to understand and enables prediction of payable charges?
When having navigated the website	How easy was it to find what you were looking for on the website today?

Example questions for a potential centralised survey

Timing: Towards ends of financial year every/every other year.

Questions: 1-10 rating + optional comment

1. Overall satisfaction: Thinking about all aspects of your dealings with the code manager in relation to [relevant code], overall how satisfied are you with the service provided to your organisation?
2. Modification process: How well do you think the code manager handles modifications?
3. Independence: How much do you trust that the code manager operates independently and makes objective decisions in light of what is best for the code and consumers?
4. Code accessibility: How easy do you find the code and related documents to understand?
5. Stakeholder engagement: How well do you think the code manager identifies and engages with the right stakeholders?
6. General feedback: Do you have any other feedback for the code manager?