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Dear Mark,

- **Code Governance Review: Major Policy Reviews and Self Governance;**
- **Code Governance Review – role of code administrators and small participant/consumer initiatives**

The Energy Retail Association (ERA) represents electricity and gas suppliers in the domestic market in Great Britain. All the main energy suppliers operating in the residential market in Great Britain are members of the association - British Gas, EDF Energy, RWE npower, E.ON, ScottishPower, and Scottish and Southern Energy.

Given that each supplier will be responding individually, it is important for Ofgem to refer to each supplier's responses to both consultations for detailed views on their positions.

Given the importance of ensuring that the codes are able to respond effectively to future challenges, the ERA is pleased to offer comments on Ofgem's two consultations on reviewing code governance – firstly to the *Code Governance Review: Major Policy Reviews and Self Governance*. With regards to the "major policy review process" as outlined by Ofgem, the ERA's members could not fully support it unless further checks and balances were put in place. However, all suppliers are supportive of the self-governance process.

The ERA's members urge caution before making the proposed changes to the role of code administrators and small participant/consumer initiatives. The ERA's members would caution against the 'one size fits all' approach as proposed by Ofgem, where changes are proposed that would not only result in few benefits for customers, but would also place additional costs on suppliers. It should also be pointed out that the current code administration arrangements are not static but evolve as and when necessary.

If you have any questions or would like to discuss any elements of our response please do not hesitate to contact me.

Yours sincerely

Frances Williamson
Head of Policy and External Relations