



ofgem E-Serve

Promoting choice and value

for all gas and electricity customers

# Corporate Strategy and Plan 2011-2016

## Final decision

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### Overview:

This strategy and plan sets out how we will look to meet our principal objective to protect the interests of current and future gas and electricity consumers.

We welcome the Government's decision to retain Ofgem as the regulator of the energy market in Britain. Amongst other things, the Government is reviewing our role, aspects of the electricity market and the delivery landscape. We shall revisit our strategy later this year in the light of the Government's conclusions.

## Context

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Each year Ofgem is required to consult on and publish its corporate strategy and plan by the end of March. This strategy and plan takes account of responses to the open letter we published in July 2010 and to our consultation on the Proposed Corporate Strategy published in January 2011. Responses indicated substantial support for our four priority themes.

We shall revisit the strategy later this year in the light of the Government's conclusions to the reviews of our role, the electricity market, the delivery landscape and the competition and consumer protection landscape.

## Associated documents

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[Proposed Corporate Strategy and Plan 2011-2016](#), January 2011 (Ref: 01/11)

[Ofgem's five-year strategy \(open letter\)](#), July 2010 (Ref: 101/10)

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## Foreword

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This is a time of profound change for both continental European and British energy markets.

The Third European Energy Package is now coming into effect, establishing a new European Agency and bringing greater powers and independence for national energy regulators.

The European Commission is developing a strategy for competitive, sustainable and secure energy supplies for 2020 and beyond, and a proposal for the European Union's energy infrastructure needs is being debated by the European Council and European Parliament. The Commission is also publishing a series of policy papers on energy efficiency, security of supply, research and innovation and international cooperation. All this, together with wider EU strategies for a low carbon economy and policies on data privacy, access and use, will significantly affect how we regulate British energy markets.

Britain's energy sector needs to spend up to £200 billion in order to ensure secure supplies while meeting challenging environmental targets over the next decade. With this in mind the UK Government is taking forward several reviews of the regulatory framework and has now also commissioned a review of the implications of events at Japanese nuclear reactors on existing and new nuclear plants in the UK.

The Government is developing plans to reform the electricity market. We expect significant work to emerge from this as we support the Government's review. Reviews of Ofgem and the energy and climate change delivery landscape, in which Ofgem E-Serve has played a prominent role, are well advanced. In addition, the Government is consulting on changes to the competition and consumer protection regulatory landscape. These reviews will clarify the precise definition of our role.

Our commitment and, indeed, duty to protect existing and future consumers are undiminished. Thus we have published proposals to develop the RIIO price controls that will facilitate the substantial investment needed in our energy networks over the next decade, whilst containing the impact on consumers' bills. Implementing this innovative approach across the networks will be a major programme of work over the next two years.

We are well advanced in our review of Britain's gas and electricity retail markets and will, following consultation, pursue measures that sweep away complex and unfair pricing practices to ensure that the market works effectively for consumers. We have also announced a consultation on proposals to boost the liquidity of the country's wholesale electricity market. Implementing these proposals will necessitate very substantial work for Ofgem over the year ahead.

Subject to the outcome of the delivery landscape review, our role in licensing and regulating the growing offshore network and in administering Government environmental programmes also represents a very substantial commitment.

We shall revisit our strategy in the light of Government reviews but we expect that the four policy areas below will remain the areas where Ofgem will focus its attention to protect the interests of consumers:

- contributing to the achievement of a **low carbon** energy sector
- helping to maintain the **security** of Britain's energy supplies
- promoting **quality and value** for all consumers
- ensuring the timely and efficient **delivery of Government programmes for a sustainable energy sector**.

We are grateful to those who have expressed views on the strategy as it has developed which, in accordance with our legal requirement, we are publishing today. We fully expect to revisit the strategy later this year in the light of the major developments that will take place in the coming months.

A handwritten signature in black ink, appearing to read 'John Mogg', with a stylized flourish at the end.

**The Lord Mogg KCMG**  
**Chairman, Gas and Electricity Markets Authority**

# 1. Contributing to the achievement of a low carbon energy sector

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1.1. EU and UK targets for curbing greenhouse gas emissions and increasing renewable power provide the overall policy direction for the energy sector. One of the Government's key goals is to reduce carbon emissions by at least 34% by 2020. Meeting that target will set the UK on the right path to meet the target of reducing greenhouse gas emissions by at least 80% by 2050. Ofgem will do everything that it can to promote a cost-effective switch to low carbon energy on a timescale consistent with these targets.

1.2. We will continue to use our regulatory expertise and knowledge of energy markets to help shape the efficient decarbonisation of Britain's energy industry. We will encourage the investment required to develop new, low carbon generation and upgraded transmission networks. This requires a stable regulatory framework and market rules that offer a reasonable rate of return for investors. Ofgem E-Serve administers and ensures compliance with several Government initiatives to encourage low carbon generation and energy efficiency.

1.3. Ofgem has already taken action that will help the sector cut emissions. The new RIIO model for network price regulation will provide a stable backdrop against which the companies will be able to raise finance. The model will also strengthen the incentives for companies to connect lower carbon energy sources and to provide the network capacity that will be required by new, low carbon technologies such as electric vehicles. Eight-year price controls will give the companies greater scope for longer term planning and with financial incentives in place we have every reason to expect that the companies will deliver on their agreed output targets.

1.4. The Low Carbon Networks Fund is already helping to finance projects that will enable the electricity distribution businesses to understand how to meet the changing needs of generators and consumers while switching to a low carbon economy. We are also taking forward Project TransmiT, our comprehensive review of the charging regime and connection arrangements for Britain's high-voltage electricity network and high-pressure gas grid. Around half the investment needed in transmission and distribution will be spent on connecting new offshore generation to the onshore network. Ofgem E-Serve is running competitive tenders for the right to own and run offshore transmission assets.

1.5. Reducing electricity consumption is an essential part of meeting Britain's contribution to a 20% reduction in EU energy consumption by 2020. Ofgem will continue to encourage demand-reduction measures and informed consumer participation in them. In particular, smart meters will give customers the information they need to take greater control of their energy usage. Ofgem is already taking steps to improve regulatory safeguards for consumers who have meters with smart technology.

1.6. We have also successfully managed on behalf of DECC the policy design phase of the government programme to mandate the mass rollout of smart meters. Ofgem will continue to engage constructively and actively with DECC in a regulatory capacity to ensure that the smart meters programme delivers benefits to consumers and contributes fully to achieving Government goals for a sustainable energy sector.

1.7. Ofgem will continue to advise the Government as it develops the detail of its proposals to reform the electricity market. We will also continue to work with Government on the detail of the Green Deal to ensure that the interests of consumers are protected, including in the secondary legislation needed to give effect to the Government's plans.

1.8. Finally, we will work with Government and others to consider issues raised by the development of new markets, such as renewable heat, which could have an important role in meeting Britain's renewable targets.

## What we will do in 2011-12

### Energy networks

- RIIO – Apply the RIIO conclusions in the next transmission and gas distribution price control reviews.
- Transmission Operator investment incentives – assess and decide funding for major investment projects that will facilitate 2020 renewable targets.
- With DECC, jointly chair the new Energy Networks Strategy Group.
- Low Carbon Network Fund (LCNF) - decide on new electricity distribution projects to receive funding.
- Innovation incentives – develop proposals to extend LCNF principles to electricity transmission and gas transmission and distribution.
- TransmiT - conclude our review of transmission network charging arrangements to ensure they remain able to deliver sustainable supplies and value for money.
- Offshore transmission - issue transmission licences for Round 1 companies, select preferred bidders for Round 2a licences and implement refinements to the existing enduring offshore transmission regime.
- Decide whether a part of National Grid's gas transmission network should be disposed of to enable its use to transport carbon dioxide for a Carbon Capture and Storage demonstration project.
- Review the regulatory arrangements surrounding the connection of distributed generation and the injection of biomethane.
- With DECC, jointly chair a Smart Grid Forum to consider the opportunities and issues associated with the development of a smart grid in Great Britain.

### **Energy markets**

- Continue work to reform market processes to encourage new market entry and the development of new energy services for consumers.
- Work with Government and industry on the electricity market reform to encourage investment in low carbon generation.



## 2. Helping to maintain the security of Britain's energy supplies

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2.1. Well functioning markets in continental Europe are vital to Britain's security of supply. In part that results from increasing dependence on gas imports from Europe and greater interconnection with continental European gas and electricity networks. It also stems from EU Regulations and Directives that increasingly set the framework for how we regulate British energy markets. Ofgem will continue to take a leading role in developing European regulatory policy to make sure that new legislation enhances security of supply in Britain.

2.2. Moving to a low carbon economy at a time of increasing dependence on energy imports will increase the challenge of maintaining security of supply. This will test the strength of the regulated network and the efficiency of markets. We have therefore been careful to ensure that many of the policies that we are taking forward to contribute to a lower carbon energy sector will also help maintain the security of Britain's energy supplies. For example, the RIIO package will facilitate the necessary investment by establishing clear principles at the outset that will govern our approach in future network price control reviews. All parties, including investors, will benefit from increased certainty and clarity about how we will make regulatory decisions.

2.3. Under Project TransmiT, our review of transmission charging and connection arrangements, we are seeking to determine whether all or part of the charging regime should be modified and to facilitate the timely connection of new (including low carbon) generation. Our work on competitive offshore tenders, transmission incentives and energy efficiency will also contribute to maintaining security of supply.

2.4. We will continue to build our capability in security of supply modelling to identify potential future developments and their impacts on the security of Britain's energy supplies. As part of this we will work with government, industry and the research community to identify the impact and risks around technological and market developments which will be important in shaping the energy landscape. We will also provide the Secretary of State with options for capacity measures to be used in the near term assessment of whether there is adequate electricity supply capacity. We will also conclude our work to assess electricity market liquidity improvements in the spring of 2011 and will align any changes with the Government's wider electricity reform package.

2.5. Finally, the reforms that we have made to the industry code governance arrangements will enable us to take a more pro-active role where necessary to help achieve security of supply and low carbon objectives. We have already launched an SCR to examine the case for sharper incentives on gas shippers to avoid an emergency, as well as the potential case for enhanced obligations on suppliers and/or the System Operator. We will consult with industry, consumers and other stakeholders throughout the course of 2011 and seek to put in place any required changes to codes and/or licences by winter 2011-12.

2.6. After the Government publishes its Electricity Market Reform White Paper, we expect to launch an SCR on potential reforms to electricity cash-out arrangements. This SCR will investigate the imbalance ('cash-out') charges paid by parties who do not balance their generation and supply needs to ensure they accurately reflect the costs of actions taken by the System Operator to balance the system. Sharper cash-out prices can enhance security of supply by providing both stronger commercial incentives for parties to manage their imbalance and stronger investment signals to peaking plant.

## **What we will do in 2011-12**

### **Energy Networks**

- RIIO - Apply the RIIO conclusions in the next transmission and gas distribution price control reviews.
- Publish conclusions to the Project TransmiT review of the transmission charging and connection arrangements.
- European transmission - work to harmonise arrangements and facilitate cross-border trading.
- Great Britain Security and Quality of Supply Standard - review and decide on proposals put forward by National Grid.

### **Energy markets**

- Continue to review our regulatory treatment of Third Party Access at gas storage and LNG facilities to promote future investment.
- Undertake a Significant Code Review on gas security of supply.
- Undertake a Significant Code Review on electricity cash-out arrangements (subject to the outcome of the Government's electricity market reform process).
- Enhance security of supply modelling.

### 3. Promoting quality and value for all consumers

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3.1. Meeting EU and UK low carbon targets will impact on consumers' energy bills. The upward trend in global energy prices, along with additional measures to combat fuel poverty, will also put strong upward pressure on domestic bills. To ensure that energy bills are no higher than they need to be, we will carefully regulate the network companies and monitor the activities of generation and supply businesses. We will take action where necessary to promote and protect consumers' interests.

3.2. We will apply the RIIO conclusions in the electricity and gas transmission and gas distribution price control reviews. The RIIO framework places strong incentives on the network companies to deliver the required outputs efficiently.

3.3. We are well advanced in our review of the retail markets and have published proposals to enhance market contestability, promote greater transparency and increase consumer confidence. We shall also continue to investigate whether more needs to be done to protect those consumers that remain persistently disengaged, or find engagement in the market difficult - particularly if these consumers fall into vulnerable groups. We will also rigorously police existing licence obligations to ensure that consumers are treated fairly including the new 30 day notice period to allow consumers to respond to rising prices by switching supplier.

3.4. Consistent with the Government's goal of minimising fuel poverty, Ofgem will seek to ensure, where we are in a position to do so, that the financial burden of moving towards a low carbon sector does not fall disproportionately on those least able to pay. Ofgem will also continue to press companies to have regard to the difficulties facing customers by promoting best practice in debt prevention, debt management and measures needed to alleviate fuel poverty. Ofgem will also monitor the emergence of any new debt and disconnection practices enabled by smart metering.

3.5. We will assist DECC in taking forward its electricity market review, which will concentrate primarily on wholesale market issues not addressed in the current Energy Bill. We are now pursuing measures to improve wholesale market liquidity which are compatible with the direction of DECC's electricity market review and which will help ensure healthy downward pressure on retail prices. We will also review longer term System Operator incentives to minimise the costs of these activities and enable greater alignment of operational and investment decisions.

3.6. Ensuring that Britain's energy market is competitive and works efficiently in the interests of consumers will be central to our strategy. We will continue to report on the way companies meet their obligations and where necessary take action - including enforcement action - to make sure that companies treat customers fairly and deal with complaints effectively.

3.7. Smart metering will be an important catalyst for change in retail energy markets, and in related markets such as energy management services. Ofgem will continue to engage constructively in the design of the Government's mass rollout of smart meters to ensure that consumers' interests are protected. We will introduce new consumer protection measures in response to early movers and will continue to explore the safeguards that may be necessary given the innovative market developments, tariffs and services that are likely to be stimulated by smart meters.

3.8. Over time we also expect to take on new regulatory functions to support smart metering such as regulating the proposed Data and Communications Company. Importantly, Ofgem will also focus efforts on complementary reforms to how markets operate. We want smart meters as a platform for smarter markets delivering sustained benefits to all consumers. A significant code review is one of the tools we plan to use to progress this work.

## **What we will do in 2011-12**

### **Energy networks**

- Transmission Price Control Review (TPCR) Roll-over - Finalise arrangements for the extension of the existing transmission price controls to 2013.
- RIIO – Apply the RIIO conclusions in the next transmission and gas distribution price control reviews.
- Conclude the design of the broad measure of customer satisfaction for electricity DNOs and continue to monitor the effectiveness of new connections guaranteed standards and other measures introduced at the beginning of the DPCR5 period.
- Work with the DNOs to consider the development of output measures.
- Assess and consult on the DNOs' proposals for charging arrangements for extra high voltage customers.

### **Energy markets**

- Take forward proposals arising from the Retail Markets Review to ensure that the markets work effectively for all consumers.
- Take forward measures to improve the liquidity of the wholesale markets.
- Implement and monitor new rules on advance price change notification, taking enforcement action where appropriate if suppliers do not comply fully.
- Improve the clarity of contracts in retail markets.
- Ensure appropriate protections for small businesses and monitor their experience of operating in competitive energy markets.

- Review longer term System Operator incentives.
- Publish package of smart meters consumer protection proposals in response to early movers and to cover the early stages of the smart meters roll out and keep the need for further steps under review.
- Develop the work programme required to create smarter markets from the platform of smart meters, including review the timing and scope of a significant code review.
- Assess the need for additional consumer protection in the light of market developments such as the Green Deal, energy services and tariffs, an increase in demand-side response and the development of heat markets.

### **Protecting vulnerable consumers**

- Continue to explore and, where possible, improve the experience of vulnerable consumers engaging in the market.
- Continue monitoring of debt and disconnection, complaint handling and redress and promotion of best practice.
- Examine the distributional impacts of costs on consumers, including environmental schemes.
- Work with DECC and others such as BIS to help inform policy thinking and approach to tackling issues affecting vulnerable consumers, especially given the proposed changes to consumer landscape.

### **Transparency and enforcement**

- Monitor retail and wholesale markets and take action using our enforcement powers where appropriate to protect consumers.
- Develop and consult on proposals to improve our enforcement policies and practices.
- Publish quarterly energy supply market reports to provide transparency about the operation of the energy supply market.
- Ensure that the vertically integrated major energy suppliers publish reports on the separate financial performance of their generation and supply businesses.
- Consider the implications of the Government's review of the consumer and competition landscape for Ofgem's duties and functions.
- Maintain our simplification agenda and work where possible within the spirit of the 'one in one out' principle to ensure that regulatory burdens on companies are no more than they need be to protect consumers.

Build on our Consumer First work, in particular

- developing our understanding of both domestic and business consumers' attitudes and behaviours towards energy use
- working in collaboration with other organisations and drawing on consumer insight from a range of sources to ensure we do not duplicate activities
- improving our website and call handling for consumers seeking advice
- developing the challenge group model to support the new RIIO approach to consumer engagement
- continuing our Consumer First panel that informs work across Ofgem and
- developing our understanding of small businesses' engagement with the energy market.

## 4. Ensuring the timely and efficient delivery of Government programmes for a sustainable energy sector

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4.1. Ofgem E-Serve was set up to use our regulatory expertise and industry experience to support the rapid growth of government climate change programmes and to manage the regulatory regime for offshore electricity transmission networks. Ofgem E-Serve implements, administers and ensures compliance for a number of programmes, such as Feed-In Tariffs, the Renewables Obligation and the Carbon Emissions Reduction Target. These programmes are vital to meeting the UK's challenging environmental targets.

4.2. Ofgem E-Serve also administers the offshore transmission tendering regime. The first tender round attracted several new entrants into the market and made savings of around £350m for consumers. The competitive approach should continue to generate significant savings for consumers. It will also, by delivering large scale offshore wind, contribute greatly towards raising renewable energy levels to 15% of total UK final energy consumption by 2020.

4.3. Ofgem E-Serve has managed on behalf of Government the scoping phase of the programme to roll out smart meters to Britain's 27 million homes. This has built an effective foundation for the DECC implementation team to take forward. Ofgem will continue to engage constructively and actively with the DECC programme in a regulatory capacity to ensure that consumers' interests are protected.

4.4. We expect to continue the successful implementation of the offshore transmission regime and our work on the renewable heat incentive. We will ensure that all the programmes with which we are involved are delivered through efficient administration and tight control of costs.

4.5. Ofgem E-Serve will seek to maintain its strong two-way relationship with Government and will continue to build public and industry confidence. We also stand ready to work with Government, as required, on developing and delivering new initiatives, such as those related to the Green Deal and Energy Company Obligation.

4.6. External scrutiny of Ofgem's projects and programmes is increasing in keeping with the austerity measures across Government. Our expertise in project and programme management is a critical part of our planning and delivery to ensure delivery to time, cost and quality, in line with good practice.

4.7. Ofgem E-Serve manages back office functions for the Ofgem Group and others. We will continue to explore ways of increasing our back office efficiency, for example through increased sharing of back office services with other regulators.

## What we will do in 2011-12

Subject to the outcome of DECC's delivery landscape review, we will:

- administer existing programmes (Renewables Obligation, REGO, Feed-in Tariffs, CCL exemption certificates, NFFO oversight, Carbon Emissions Reduction Target and Community Energy Saving Programme) and monitor the energy companies to ensure they can demonstrate their compliance with the regulatory regimes
- develop and operate the Government's new Renewable Heat Incentive, a world first scheme providing financial support to renewable heat generators
- start monitoring compliance with the Government's new Warm Home Discount scheme, a scheme that will require energy suppliers to provide over £1 billion of support to vulnerable consumers from April 2011
- bring biomass sustainability criteria into force for bioliquids used under the Renewables Obligation from April 2011, and continue to develop these requirements for biosolids and biogas
- begin designing administrative and compliance processes for the new Energy Company Obligation, which is proposed to replace the Carbon Emissions Reduction Target and Community Energy Saving Programme from 2013
- apply learning and good practice standards from our own experience, from Government and from the private sector to our projects and programmes, risk management and stakeholder engagement
- continue to design and build information systems that support and improve the efficiency and robustness of programmes that we administer on behalf of DECC
- continue to provide highly efficient and effective operational support processes to Ofgem and other regulators
- continue to reduce overhead costs (which already benchmark very well against similar sized departments) by making more efficient use of existing office space and exploring the scope to share services, notably with other regulators.



## Appendices

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## Appendix 1 - Deliverables and Performance Indicators

### Deliverables 2011-12

#### Theme 1 - Contributing to the achievement of a low carbon energy sector

Division	Action	Target Quarter
Smarter Grids & Governance	Half-yearly reports to the Secretary of State on the Connect and Manage grid access regime	Q2 and Q4
Smarter Grids & Governance	Publish Project TransmiT conclusions	Q3
Smarter Grids & Governance	Publish Electricity Distribution Charging Methodology structure of charges decision	Q3
Smarter Grids & Governance	Publish decision on further innovative projects to receive Low Carbon Network Fund monies	Q3
Smarter Grids & Governance	RIIO T1/GD initial and statutory consultations on fast track licence drafting	Q3 and Q4
Smarter Grids & Governance	RIIO T1/GD consultation and decision on potential fast track companies	Q3 and Q4
Smarter Grids & Governance	Funding decision for anticipatory investment under Transmission Operator incentives	Q3 and Q4
Smarter Grids & Governance	Publish findings from the first year of the Smart Grid Forum	Q4
Sustainable Development	Publish Sustainable Development report and letter to Secretary of State	Q3
Sustainable Development	Publish climate change adaptation report	Q3

#### Theme 2 - Helping to maintain the security of Britain's energy supplies

Division	Action	Target Quarter
Markets	Develop security of supply model	Q3
Smarter Grids & Governance	Consult on licence changes in response to the Dartford lessons learned exercise	Q4

#### Theme 3 - Promoting value and quality for all consumers

Division	Action	Target Quarter
Markets	Submit National Report to European Commission	Q2
Markets	Make decisions on next steps in relation to the Retail Market Review	Q3
Markets	Launch review of undue discrimination sunset clause	Q4

Markets	Decide whether to certify TSOs as compliant with EU Third Package unbundling provisions	Q4
Smarter Grids & Governance	Publish TPCR4 rollover initial and final proposals	Q2 and Q3
Smarter Grids & Governance	Changes to network companies' ring-fence licence conditions	Q3
Smarter Grids & Governance	Publish Electricity Distribution Annual Report	Q4
Sustainable Development	Finalise 'Spring Package' of smart metering consumer protection measures	Q1
Sustainable Development	Consult on revised Enforcement Guidelines	Q3
Sustainable Development	Publish discussion paper on affordable energy	Q4
Sustainable Development	Publish complaints handling research	Q4
Sustainable Development	Publish research on vulnerable customer engagement with the market	Q4

**Theme 4 - Ensuring the timely and efficient delivery of Government programmes for a sustainable energy sector**

Division	Action	Target Quarter
Group Functions	Publish annual report on the Community Energy Saving Programme	Q1
Group Functions	Publish annual report on the Carbon Emissions Reduction Target	Q2
Group Functions	Set the Fossil Fuel Levy Rate for 2012-13	Q3
Group Functions	Publish annual report on the Feed in Tariffs scheme	Q3
Group Functions	Publish annual report on Renewables Obligation	Q4
New Schemes	Set Warm Home Discount supplier obligations	Q1
New Schemes	Commence administration of the Renewable Heat Incentive	Q2
New Schemes	Publish revised register for Feed-in tariffs	Q1
New Schemes	Publish revised register for Renewables Obligation	Q1
New Schemes	Renewables Obligation sustainability criteria: publish bioliquids guidance	Q1
New Schemes	Make first Renewable Heat Incentive payments to commercial participants	Q3
New Schemes	Renewables Obligation sustainability criteria: publish biosolids reporting guidance	Q3
Offshore transmission	Issue first licences under Tender Round 1	Q1
Offshore transmission	Complete shortlist of bidders for Tender Round 2a	Q1
Offshore transmission	Select preferred bidders for Tender Round 2a	Q3

Offshore transmission	Issue final licences under Tender Round 1	Q4
Offshore transmission	Implement refinements to existing enduring offshore transmission regime	Q4

## Performance Indicators 2011-12

1.1. Ofgem is reviewing its suite of performance measures used internally to monitor gas and electricity markets and to understand the effectiveness of our own activities. We expect to be implementing a performance dashboard approach to enable senior management and the Authority to monitor outcomes related to our activities and goals under each theme in our strategy. When we have a clearer understanding of how these work we plan to publish further outcome-based measures.

### Ofgem performance indicators

Division	Measure	Target	Timing
Markets	Consult on and carry out consultations regarding any applications made for exemption from Third Party Access arrangements under Article 22 by prospective storage and interconnector operators	100%	
Markets	Send decisions on Article 22 exemptions to the European Commission within prescribed timescales if adequate data has been provided	100%	
Markets	Assess and make decisions about any Income Adjusting Event within three months of it being raised if adequate information has been provided	100%	
Sustainable Development	Protect consumers by responding substantively to customer contacts	93%	10 work days
Sustainable Development	Respond to complaints on enforcement matters confirming whether we will investigate	90%	4 weeks
Smarter Grids & Governance	Make code modification decisions within 25 working days of receiving the Final Modification Report (or, where applicable, final responses to a Final Impact Assessment or other Ofgem consultation)	90%	Annual
Smarter Grids & Governance	Publish code modification IAs within 3 months of receiving the Final Modification Report	90%	Annual
Smarter Grids & Governance	Grant competitive licence applications within 45 days of receipt of a duly made application	100%	Annual

**Ofgem E-Serve performance indicators**

Division	Measure	Target	Timing
Group Functions	Issue the main batches of renewable certificates	95% within 17 working days of the generators' reporting deadline of their output data April-June & 12 days July-March	Monthly
Group Functions	Follow up with the generators outstanding issues on their applications for accreditation	90% within 10 working days	Monthly
Group Functions	Respond to obligated party Carbon Emissions Reduction Target and Community Energy Saving Programme schemes for approval	90% within 10 working days of the submission deadline	Monthly
Group Functions	Feed-in Tariffs levelisation process to be completed in a timely manner after receipt of data from suppliers	95% within 20 working days	Quarterly
Group Functions	Recycle the Renewables Obligation buy-out funds by 1 October (within one month of the deadline for the supplier payments)	95%	Annually
Group Functions	Complete reconciliation of Combined Heat and Power Levy Exemption Certificates after receiving accurate data from the Department for Environment, Food and Rural Affairs	95% within 25 working days	Annually
Group Functions	Respond to inquiries under the Freedom of Information Act	90%	Within 20 days of receipt
Commercial - New Schemes	Process supplier applications for Warm Home Discount activity after receiving adequate information	90% within 20 working days of the submission deadline	Monthly
Commercial - Offshore	Conduct timely and robust tender process for 20 year licences	Achievement of timetables & publication of relevant data	Q1-Q4

## Appendix 2 - Budgets and Spend

### Funding

1.2. Ofgem's regulatory budget is funded by fees collected from licensed energy companies. Ofgem E-Serve's costs are met from a variety of sources, predominantly either from the schemes themselves or from DECC's budget which, for example, will fund the work to develop administration of the new environmental programmes to support feed-in tariffs and the renewable heat incentive.

1.3. Direct funding sources for Ofgem E-Serve's work include the offshore wind programme and the other environmental programmes administered on Government's behalf. Ofgem also receives a contribution from DEFRA to cover its share of the costs of running the headquarters building shared by Ofgem and DEFRA.

### Five year plan

1.4. Ofgem's estimated gross costs for the next five year period are set out below.

**Figure 1: Ofgem's expenditure**

£m	2010-11 Planned	2011-12	2012-13	2013-14	2014-15	2015-16
Smarter Grids & Governance	£16.2	£18.2	£17.5	£17.3	£17.3	£16.8
Markets	£13.4	£12.1	£12.6	£12.5	£12.8	£13.2
Sustainable Development	£6.5	£7.1	£7.8	£8.1	£8.2	£8.5
Scotland, Wales & the Regions	£1.4	£1.7	£1.7	£1.5	£1.6	£1.6
Expected regulatory changes eg. Government Reviews	£0.0	£6.9	£8.0	£8.4	£8.5	£8.7
OFGEM	£37.5	£46.0	£47.6	£47.8	£48.4	£48.8
Smart meters	£14.9	£0.0	£0.0	0.0	£0.0	0.0
OFGEM E-SERVE						
- Offshore	£10.0	£9.8	£10.1	£9.1	£9.3	£9.6
- New schemes	£10.6	£8.1	£8.8	£8.1	£8.9	£9.6
- Ongoing schemes	£5.7	£8.3	£8.1	£5.6	£5.7	£6.3
<b>GROSS TOTAL</b>	<b>£78.7</b>	<b>£72.0</b>	<b>£74.6</b>	<b>£70.6</b>	<b>£72.3</b>	<b>£74.3</b>

1.5. Ofgem's 2010-11 actual spend will be significantly lower than the planned gross budget of £78.7 million. This is because of efficiency savings, delays to environmental scheme development and the Government's austerity measures, such as the pay freeze and constraints on staff recruitment and the use of consultants. Ofgem E-Serve projected spending relates to Government programmes that we have been asked to deliver. There may be changes to the programmes that we will be asked to deliver in future years covered by this plan.

1.6. Expected regulatory changes are expected to give rise to an additional budgetary requirement and a consequent increase in licence fees. These result from Government reviews in progress (notably the Electricity Market Review, the review of Ofgem and the DECC Delivery Landscape Review) and other very significant regulatory activities such as the regulatory activities we will be pursuing as a result of our Retail Market Review, developments to offshore transmission operator regulation and smart meter regulation. Many of these activities are incremental to those anticipated at the time of consulting on this plan.

1.7. The budgets reflect our best estimates of costs. In particular the budgets for smart meters costs have been reduced to reflect decisions about responsibilities for future phases of this programme. The RPI-3% budget ceiling has been reduced accordingly. Ofgem budgets include provision for expected changes resulting from the reviews described above which will impact on Markets and Sustainable Development. Budgets for Smarter Grids and Governance include expected costs associated with delivering transmission and gas distribution price control reviews in line with the RIIO model.

### Cost control regime

1.8. 2009-10 was the last year of Ofgem's first five year cost control regime. We saved a total of £11.9 million over the five year period.

1.9. The Authority has determined that Ofgem should operate a further five year cost control regime running from 2010-11 to 2014-15. The Authority also determined that the regime should continue on the basis of RPI-3% with a maximum year-end carryover of any savings of £5 million. We anticipate savings of at least £12.5 million from this regime. In 2012-13 gross expenditure of £74.6m exceeds the budget ceiling by £1.5m and this will be offset by agreed carryover savings.

1.10. Given the increasing number of environmental projects that Ofgem is being asked by Government to administer, the Authority has determined that these costs should also be subjected to the efficiency regime.

**Figure 2: Ofgem's RPI-3% Calculation**

<b>£m Rate Applied</b>	<b>2010-11 2.4%</b>	<b>2011-12 4.8%</b>	<b>2012-13 2.5%</b>	<b>2013-14 2.5%</b>	<b>2014-15 2.5%</b>
Baseline	£81.5	£81.0	£73.5	£73.1	£72.7
Adjustment for Smart Meters	£0.0	(£9.6)	£0.0	£0.0	£0.0
Offshore	£0.0	£1.0	£0.0	£0.0	£0.0
RPI	£2.0	£3.4	£1.8	£1.8	£1.8
Baseline + RPI	£83.5	£75.8	£75.3	£74.9	£74.5
Less X (3%)	(£2.5)	(£2.3)	(£2.2)	(£2.2)	(£2.2)
Budget Ceiling	£81.0	£73.5	£73.1	£72.7	£72.3

1.11. RPI was determined as 2.4% for 2010-11 and 4.8% for 2011-12. RPI has been estimated at 2.5% for later years and will be adjusted to the prevailing (December) rates.



## Appendix 3 - Simplification Plan 2011-12

1.1. Ofgem is committed to the principles of better regulation and we are continually seeking to improve our efficiency and effectiveness. As a part of this, and in order to reduce regulatory burdens while ensuring proper consumer protection, we published our first Simplification Plan in March 2006. Ofgem E-Serve is equally committed to the better regulation agenda and will seek to administer environmental programmes in a flexible and responsive manner.

1.2. The Simplification Plan below outlines the better regulation activities that we will undertake in 2011-12. Consistent with the Authority's duty under the Regulatory Enforcement and Sanctions Act 2008, we have considered whether there are any regulations that impose burdens that could, in the context of our duties generally, be considered unnecessary. We have carefully considered the comments we received in response to our consultation in January 2011. We will set out the progress that we have made on these projects in our Annual Report and Accounts later this year.

### Process initiatives

Initiative	Outcome	Current status
The new RPI-3% internal cost control for 2010-15	The previous cost control increased our efficiency and licensees' fees were reduced substantially. The new control maintains the pressure for efficiencies. Cost reductions will be passed on to licensees	The current internal cost control came into effect on 1 April 2010 and commits Ofgem to save at least £12.5 million in 5 years.
Consumer First - improving our understanding of domestic consumers' priorities	The project has led to improved decisions that take proper account of consumers' views. Consumer First will continue to embed consumer insight into our policy making.	We have published research and other data to facilitate debate. We are looking to improve our website and call handling services and will consider how to build on the challenge group model to support the new RIIO approach to consumer engagement

### Ofgem policy initiatives

Initiative	Outcome	Current status
Retail Market Review – financial reporting	The deadline for responses to our proposals is 1 June 2011. We are seeking greater clarity for consumers on how retail prices relate to suppliers' wholesale costs. In doing so we will ensure that burdens on suppliers are no higher than necessary to protect consumers' interests.	We propose to appoint a leading firm of accountants to review the transfer pricing and hedge accounting practices of the vertically integrated companies and report to us on the likely impact of these practices on reported profits and transparency. We propose to ask them to make recommendations to us on how to improve company reporting in future years.

Retail Market Review – tariff simplification	Responses to our proposals are due in June. We are seeking to make it easier for domestic consumers to compare prices and choose a better deal.	We have proposed to restrict the number of tariffs for standard evergreen products from each supplier to one per payment method with suppliers competing on a single 'per unit' price. Suppliers may offer an unrestricted number of fixed term products quoting prices readily comparable to their evergreen tariff unit price.
Retail Market Review – consumers' access to tariff information	We are considering the information that suppliers must provide to consumers about tariff information. We will take steps to improve transparency while ensuring that any burdens we impose on suppliers are proportionate	We are monitoring the progress of the Energy Bill, which may add new obligations for suppliers about tariff information. In the meantime, we are as part of the RMR considering whether to require suppliers to provide more standardised information on bills and annual statements. We may also take steps to improve consumer trust in switching sites.
Rolling out the RIIO conclusions	The transmission and gas distribution price controls will be the first time the new regime is used	We have begun work on these price controls and will consult on fast-track proposals in Q3.
Reviewing the gas transmission licence	Consider the scope for simplifying the licence held by National Grid Gas	We will take this work forward as part of revising the transmission licence for the price control roll over and RIIO-T1.
Reviewing gas distribution licences (focusing on the elements of the licence relating to Gas Distribution Networks)	We aim to improve the clarity of the Standard and Special Standard Conditions without making substantive changes to underlying policies and obligations. We will concentrate on restructuring and consolidation, including removal of redundant conditions and simplifying and redrafting to improve clarity and certainty.	We have consulted on the review scope and process. We are leading an industry working group. We will decide shortly on the revised structure for the licence. We will also publish the way forward for this project and how it will dovetail with licence changes to address the implementation of the 3 <sup>rd</sup> package and licence drafting associated with RIIO-GD1.
Networks regulatory reporting requirements	We will carry out a review of the reporting requirements that we place on the transmission and distribution companies	We have launched this review and have appointed consultants to advise us on a risk-based and proportionate approach.

## Ofgem E-Serve initiatives

Initiative	Outcome	Current status
Updating procedures for administering the existing environmental programmes including the Renewables Obligation, the Feed in Tariff, the Carbon Emissions Reduction Target and the Community Energy Saving Programme	More effective application and efficient administration. Effective use of business process design techniques and compliance powers	Quarterly risk reviews feeding back into changes to our processes. Reviews are also under way to take account of revised Government requirements.
Introducing new Government environmental programmes including Renewable Heat Incentive and Warm Home Discount	We intend to administer these schemes cost effectively and efficiently, drawing on our experience, facilities and teams from existing environmental programmes and social tariff schemes. We will use business process design techniques and compliance powers effectively	We are advising DECC in relation to the Renewable Heat Incentive and the Warm Home Discount and are undertaking detailed design of our administration and compliance processes for these schemes
Developing the offshore transmission regulatory regime	Less onerous regulatory burden at start and during life of projects	The competition for nine projects in the first round – covering £1bn worth of transmission links - attracted a good response.

## Appendix 4 - Summary of Consultation Responses

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1.1. In the consultation on the Proposed Corporate Strategy and Plan 2010-2015 we sought the views of respondents on the following questions:

- Are the proposed themes suitable?
- Have we identified all the relevant issues within each theme?
- Is Ofgem's approach to the challenges ahead the right one?
- Are there any areas of regulation that constitute an unnecessary burden that should be removed?
- What performance measures do you believe we should use?

### List of Respondents

List	Name
1	Campaign for National Parks
2	CE Electric
3	Charles Hendry MP, Minister of State, Department of Energy and Climate Change
4	Consumer Focus
5	Electricity North West
6	Elexon
7	E. ON UK
8	Energy Networks Association
9	Gas Forum
10	National Grid
11	Mr Graham Spiers
12	Northern Gas Networks
13	PLACE
14	RWE npower
15	Scottish and Southern Energy
16	UK Power Networks

### Summary of Responses

1.2. We received 17 responses to the consultation on our proposed strategy, one of which was confidential and one of which was from a private individual. The non-confidential responses have been published at [www.ofgem.gov.uk](http://www.ofgem.gov.uk) and are available from our library. The summary is arranged according to our corporate themes.

### ***General points***

1.3. Respondents generally agreed that the four corporate themes were appropriate given the need to reduce carbon emissions while maintaining secure and affordable energy supplies. The key message was that Ofgem should increase regulatory stability and reduce uncertainty so as to encourage the necessary investment.

1.4. One respondent said the plan should be more 'consumer-centric' in language and approach and that 'consumer value and quality' needed to be integrated across the board rather than being just a separate programme of work. Two respondents agreed that we should review our strategy in mid-year in the light of conclusions to the various Government reviews. The same respondents were concerned that our internal cost control should not lead to our having insufficient resources to fulfil our regulatory responsibilities.

### ***Ofgem's position***

1.5. We confirm that the themes will remain in place for the 2011-2016 strategy. We will, within the extent of our remit, seek to minimise uncertainty for market participants and investors. Fundamental to this will be our work on the RIIO price controls and implementing the conclusions to our reviews of the retail markets and wholesale market liquidity. In progressing this and other, vital work, we are as determined to ensure consumers receive value for money and good quality services as we are to reduce carbon emissions and maintain secure supplies.

1.6. As noted in January 2010, we fully expect to revisit our strategy later this year after the Government has concluded the reviews that affect Ofgem and the markets we regulate. Finally, we are committed to bearing down on our costs but we will assess our resources as necessary to ensure that we continue to fulfil all of our regulatory responsibilities.

### ***Contributing to the achievement of a low carbon energy sector***

1.7. Three respondents stated that the RIIO price controls should be implemented in a flexible manner that attracts investors. The network companies highlighted their concern over financeability while another respondent was clear that RIIO and associated incentives should facilitate competition in shipping and supply.

1.8. One respondent expressed concern about the cost of delivering low carbon networks and stated that a tight rein would need to be kept on costs to ensure that there was not a further significant deterioration in the affordability of energy. This respondent also urged Ofgem to ensure that good consumer engagement practice in Low Carbon Network Fund projects can be appropriately shared and to ensure equal access to customer data by new entrants to the developing energy services market.

1.9. One respondent argued that the case had not been made for radical reform of the transmission charging arrangements and that network charges in general should be cost-reflective and include locational elements in order to minimise stranding

risks. In relation to offshore networks, this respondent welcomed the generator-build option but called for consultation on implementation issues and on whether to adopt point-to-point connections or an integrated approach.

1.10. Two respondents said that the strategy should give more priority to the potentially vital role of gas in the future energy mix, including unconventional sources of gas. One of these respondents said that we should have a deliverable in relation to encouraging biomethane connections to the gas distribution networks. One respondent noted that the Government's plans for electricity market reform were a radical departure from competition and stated that more work was needed to avoid over-design, in particular on the links between the carbon floor price and feed-in tariffs or two-way contracts for differences. Another respondent called for Ofgem to continue to promote competitive gas wholesale markets.

#### *Ofgem's position*

1.11. Our RIIO model creates a stable regulatory framework that is intended to give the long term security that investors need. It also encourages the companies to deliver sustainable energy supplies at a lower cost than under the RPI-X model of regulation, ensuring consumers pay no more than they need to for network services. We have carefully considered the responses that we received to the December 2010 RIIO-T1 and GD1 documents and are about to publish our plans for the next phases of the price controls. We will ensure that processes are put in place to allow sharing of effective consumer engagement strategies for Low Carbon Network Fund projects.

1.12. We agree that the transmission charging regime has served consumers well by promoting efficient use of the networks and effective competition in generation and supply. However, we do need to consider whether these arrangements are most likely to facilitate a decarbonised energy sector while providing safe, secure, high quality network services at value for money to existing and future consumers. We will consult on a range of options.

1.13. While there is uncertainty about the future role of gas in the energy mix, we recognise that it is likely to have a vital long term role. We have reflected this in our proposals on depreciation policy for gas networks. We are also committed to considering the arrangements surrounding biomethane injection into the grid. We will continue to advise Government on the detailed design of its electricity wholesale market policies including the interplay between any carbon floor price and other instruments such as Feed in Tariffs and Contracts for Differences.

#### ***Helping to maintain the security of Britain's energy supplies***

1.14. Several respondents noted the European dimension to secure supplies and welcomed our continuing participation in European energy regulation. These respondents stated that we should, in seeking to harmonise transmission policies, use market-based mechanisms where possible and that EU Directives and Regulations should not be gold plated when implemented in Britain. One respondent stated that we could increase our contact with national third sector and consumer organisations when preparing input into EU policy documents. One respondent

requested that Ofgem commit to faster turnaround of applications for third party access exemption under EU regulations. Another sought clarity on our future work to encourage demand-side response. One respondent argued that the market would provide the least cost means of delivering secure supplies and stated that any Government intervention should be backed up with a robust impact assessment. This respondent also stated that RIIO output measures should reflect uncertainty about sources of gas supply and enable a flexible response from the networks, such as connecting biogas.

1.15. Our Significant Code Review (SCR) proposals drew comment from several respondents. One respondent said that it would be very hard to deliver three SCRs within the same financial year and that we should run them consecutively. This respondent thought the smart meters SCR could be delayed until 2012 and that we should await the results of a post-implementation review to decide whether there needed to be a SCR on electricity cash-out. Another respondent stated that in the absence of measures to boost liquidity, changes to the cash-out regime would be likely to worsen entry barriers. There was concern over the timetable for the gas security SCR and one respondent said there should be a deliverable for this project.

#### *Ofgem's position*

1.16. We will continue to be closely involved in the development of EU energy policy and recognise that it will increasingly influence the manner in which we regulate British gas and electricity markets. We remain keen to ensure that EU policies are pro-competitive and will continue to advise DECC on their transposition into UK law. As noted above, we will also continue to advise Government on the detailed design of its electricity market reform proposals.

1.17. On SCRs, the three issues identified are not new and we have previously indicated through our Corporate Plan that they are a priority for us. We will consult separately on the scope and timing of each SCR. We are aware of the interaction between wholesale market liquidity and cash-out prices and will shortly announce measures to boost liquidity. We will also continue, consistent with the performance indicator set out in appendix 1, to process exemption application requests efficiently.

#### ***Promoting choice and value for all customers***

1.18. Two respondents stated that Ofgem should intervene less in retail markets. One of these was concerned that we might create a 'two-tier' market with new entrants having fewer licence obligations than established suppliers. Two respondents wanted us to conclude the liquidity review rapidly and implement significant measures to boost liquidity. One of these respondents felt that regulatory solutions were necessary as the problems were structural. This respondent also urged Ofgem to be proactive in safeguarding consumers, wanted the smart meter consumer protection package to cover early and later stages of roll out and said it was crucial to put in place a coherent enforcement and redress regime to promote consumer confidence in the Green Deal and smart meters. Another respondent stated that any such consumer protection measures should be based on demonstrable need and a clear impact assessment.

1.19. Two respondents requested that we carry out the review of IGTs and IDNOs that we have stated we would undertake in 2010-11. One respondent welcomed our intention to carry out a lessons learned review of the Dartford supply incident but felt that we should include a deliverable for it. Another respondent asked that we monitor the new connections standards of performance constructively and if necessary introduce further improvements to the standards.

1.20. One respondent noted that policies requiring changes to IT systems should come with realistic, flexible delivery timescales and called for a two-year hiatus in bringing forward policies that impact on suppliers' systems. Another respondent stated that our approach to monitoring and enforcement should be consistent with better regulation principles. A third respondent called for more monitoring of the non-domestic market and more protection for small businesses.

1.21. One respondent welcomed our commitment to ensure that the financial burden on decarbonising the sector does not fall disproportionately on those least able to pay and said we should examine the scope for fairer charging structures for Government's environmental and social policies. This respondent said we should consider the distributional impact of likely new energy deals and provide mechanisms for protecting groups that might be adversely affected. This respondent supported regular reporting on the experience of vulnerable and low income customers in the energy market and close scrutiny of suppliers' debt and disconnection practices.

1.22. Several respondents supported our simplification agenda. One wanted Ofgem to consider 'one in, one out' in policy documents where we are likely to impose new regulatory burdens while another wanted evidence and a performance indicator of how we have implemented 'one in, one out'. Two respondents welcomed a review of the network regulatory reporting requirements and licences. One stated that we should work with Government to coordinate licensees' reporting requirements to Ofgem and other public bodies. Two others felt there was scope to coordinate our consumer insight work better with that of Consumer Focus. One respondent stated that we should remove suppliers' guaranteed standards of performance.

1.23. On process, two respondents stated that Ofgem should not develop new performance indicators until the Government had concluded the reviews of Ofgem's role and the delivery landscape. Another believed we should develop performance indicators to encourage timely consultation processes that give clear explanations whenever we reject stakeholder views, and to ensure we focus on areas with a demonstrable case for intervention or where Government requires us to take action. Another respondent argued that performance indicators should be focused on the customer experience of the energy market and not simply on process. This respondent stated that Ofgem should consult separately on appropriate measures and suggested the number of customers being disconnected, customer service satisfaction, fairness of pricing, ease of switching and complaint-handling.

#### *Ofgem's position*

1.24. Ofgem remains committed to competition where this is the best means of protecting the interests of consumers. Our retail market review has identified several areas of serious concern that competition is not working effectively for all



consumers. We are consulting on a range of proposals to address this and have also proposed measures intended to boost liquidity in the wholesale markets.

1.25. We will ensure that any measures we seek to introduce are consistent with better regulation principles, including any further consumer protection measures arising from the roll out of smart meters, Green Deal or other Government schemes. We will also ensure that any regulatory burdens that we impose on companies are required to protect consumers. In particular, where we are proposing to introduce new regulatory burdens, we will seek views on whether there are any existing burdens that could, in the context of our broader statutory duties, be removed.

1.26. We have launched the review of network regulatory reporting requirements and have appointed consultants to advise us on a risk-based and proportionate approach to it. We will consider the scope to consult on the future regulatory arrangements for the independent networks in the light of respondents' comments and our other resource commitments. We will review obligations on suppliers with regard to billing information and liaise with DECC about requirements on licensees to provide information to public bodies. We do not, however, believe it is appropriate at this time to remove the guaranteed standards of performance on suppliers.

1.27. In the light of comments made by respondents to DECC's review of Ofgem, we have been considering how best to improve aspects of our operational performance. We have been looking in particular at our approach to consultation and stakeholder engagement, our use of information requests and the transparency of both our costs and of Authority decision-making. We hope to conclude this work by the summer and make some positive improvements to our ways of working. On performance indicators, as noted in the strategy, we expect to implement a performance dashboard approach to enable senior management and the Authority to monitor outcomes related to our corporate themes. We plan to publish further outcome-based measures when we have a clearer understanding of how they work.

### ***Ensuring the timely and efficient delivery of Government programmes for a sustainable energy sector***

1.28. Two respondents argued that Ofgem E-Serve had an important role to play in advising Government on the development of sustainable energy schemes but should not necessarily manage them once operational. One of these respondents said new scheme administration should be integrated with existing settlement arrangements. One other respondent felt we should be more efficient in approving CESP schemes. One respondent saw a high level of overlap between the work of Ofgem and Ofgem E-Serve in terms of the overall customer experience and stated that the regulator should take a much more proactive role in monitoring the Green Deal and smart meters until the successor to Consumer Focus is well established.

#### ***Ofgem's position***

1.29. Ofgem E-Serve's role is to help develop the processes to implement and operate effectively schemes that are established and designed by the Government. We will continue to refine our approach so that we manage the schemes in the most effective, robust and responsive way.

## Appendix 5 - Feedback Questionnaire

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1.1 Consultation is at the heart of good policy development. We are keen to consider any comments or complaints about the manner in which this consultation has been conducted and welcome views on the following questions:

- Do you have any comments about the process adopted for this consultation?
- Do you have any comments about the overall tone and content of the strategy?
- Is the strategy easy to read and understand or could it have been better written?
- To what extent does the strategy provide a balanced view or make reasoned recommendations for improvement?

1.2 Please send your comments on these and any other procedural matters to:

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Consultation Co-ordinator  
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