



## Code Administration Code of Practice

### User feedback form

The Code Administration Code of Practice (CoP)<sup>1</sup> was implemented on 31<sup>st</sup> December 2010. The aim was to facilitate convergence and transparency in code modification processes. The CoP is formally adopted by the UNC, BSC and CUSC, and has been voluntarily observed by other codes.

In accordance with Principle 4, the CoP is subject to periodical review by users. In this first review, we welcome your feedback on how well the CoP Principles are being achieved in practice and any suggested amendments that you would like to raise for consideration.

Please provide your feedback by completing this form and returning your comments to Ofgem **by Friday 20<sup>th</sup> January**:

[industrycodes@ofgem.gov.uk](mailto:industrycodes@ofgem.gov.uk)

If you would like any comments to be considered as confidential, please indicate this clearly.

*Thank you*

**Name: Andrew Margan**

**Company: British Gas**

**Email: Andrew.margan@centrica.com**

**Which industry code(s) are you actively involved with\*?**

British Gas is involved with the industry codes; UNC, BSC & CUSC.

**How would you characterise your involvement with the above code(s)?**

British Gas is Britain's largest supplier and we are reliant on the successful operation of the Codes and the services of the Code Administrators.

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<sup>1</sup> A copy of the Code Administration Code of Practice can be found at <http://www.ofgem.gov.uk/Licensing/IndCodes/CGR/Documents1/FinalCoP.pdf>

## Response

1. It is British Gas' view that the Code Administration Code of Practice has had a positive impact on the energy industry and we consider it to be fit for purpose. The convergence of code modification processes is an objective that British Gas strongly supports, specifically
  - Alignment of Industry Codes
  - Alignment of industry modification processes
  - Consistent use of industry terminology
  - Alignment of industry change management timescales
2. British Gas believes that the UNC, BSC CUSC have benefited from being part of the Code Administration Code of Practice and would support other industry codes being obliged or mandated to comply. For example, under DCUSA there is no concept of a draft or pre-modification, a feature of UNC and other codes that we feel benefits the industry and delivers more appropriate and acceptable modifications. In addition, we feel that the IGT UNC concept of a 'Critical Friend' needs to be developed whereby the Code Administrator offers support and expertise to parties in raising modifications.
3. As a result of the Code Administration Code of Practice, documentation has improved considerably; the increased clarity has facilitated more effective impact assessment. Some modifications continue to lack 'plain English' descriptions and we feel that Code Administrators should challenge parties more when this is the case. The process to raise a modification is better defined and easier to understand.
4. British Gas fully supports Principle 1 and believes it is very beneficial to have the concept of a 'Critical Friend'. The knowledge and expertise of the Code Administrators reduces time wasted, delivers better quality proposals and supports smaller parties. Some Code's Administrators are better positioned to deliver a 'Critical Friends' service. We recognise there will be a cost associated to Code Administrators providing expertise and a balance between the cost and the benefit to the industry will need to be achieved.
5. Principle 6 'A proposer of a Modification will retain ownership of detail of their solution' is fully supported by British Gas. This enables the proposer to 'drive the solution' and maintain control.
6. British Gas supports alignment of code modification time scales to deliver consistency and commonality across the industry codes.
7. British Gas supports the use of KPIs to better benchmark the service provided across the codes. Although no targets are set, we feel this can be addressed at a later point when all codes are signed up to the Code of Admin Code of Practice.

**How would you rate your experience of the overall usefulness of the CoP?**

<b>CODE</b>	<b>Very poor</b>	<b>Poor</b>	<b>Neutral</b>	<b>Good</b>	<b>Excellent</b>
<b><i>BSC</i></b>				X	
<b><i>CUSC</i></b>				X	
<b><i>UNC</i></b>				X	