

Code Administrator meeting: Code of Practice Review 2012

Date and time	7 March 2012, 10am
Location	Ofgem, 9 Millbank, London

1. Present

Kathryn Coffin	Elexon (BSC)
Tim Davies	Joint Office of Gas Transporters (UNC)
Alex Thomason	National Grid (CUSC)
Lisa Charlesworth	Ofgem
Catherine Wheeler	Ofgem

2. Terms of Reference

- 1.1. It was agreed that the Terms of Reference would reflect that the purpose of this meeting between Code Administrators (CAs) would be in line with the first part of Principle 4 of the Code Administration Code of Practice (CACoP). Namely, to discuss how the CACoP principles are being achieved, the results of the KPI reporting, and to share best practice.
- 1.2. The CAs have raised certain issues regarding the standard process templates which will also be discussed.
- 1.3. It was agreed that issues raised in Ofgem's user feedback survey (January 2012) would be discussed with a view to determining best practice application of the CACoP principles, and any potential amendments or areas for further discussion would be noted and referred to a code administrator work group (CAWG) consisting of both CAs and users.
- 1.4. Action (Ofgem): Terms of reference (ToR) to reflect the agreed scope of this meeting, and draft ToR for a subsequent CAWG meeting to be prepared.

3. Code Administrator KPIs

- 1.5. CAs are currently publishing their KPIs through usual channels. There was a general view that the 'KPIs' are measures rather than targets and there was some discussion over the value that these have for both code panels and users.
- 1.6. Some reporting difficulties were noted, for example in terms of volume of modifications, some KPI measures not being applicable in certain codes, and the potential for the results to be skewed by 'exceptional' mods. One CA commented that the KPI results may be more useful when a number of years' data has been collected and averages can be calculated.
- 1.7. Ofgem's view is in agreement with the feedback from both CAs and users that setting targets on the KPIs would not be helpful at this stage. A useful outcome of this discussion may be to look at CAs method of reporting, to ensure a consistent approach is being applied and that comparable data is achieved.

1.8. Action (CAs): CAs will provide their individual views on the usefulness of the KPIs, commenting on specific KPIs and any suggested adjustments.

1.9. Action (Ofgem): note as an agenda item for CAWG to further explore whether any amendments to the current KPI regime are required.

4. CACoP standard process templates

1.10. CAs had expressed a desire to review the standard templates in their initial feedback. Having now been using these templates for a full year, all CAs had comments as to their implementation.

1.11. It was suggested that clarity was needed on what the CACoP templates are trying to achieve, as it is presently unclear whether they are intended only as guidance or if they are inflexible in their form. It was commented that some code rules dictate that certain information must go into reports.

1.12. Views were split amongst CAs on whether the templates better meet the CACoP aims either by allowing flexibility between codes, or by being a fixed and uniform template for all codes under the CACoP to use. One point of view was that the modification proposal template is too lengthy and it requests certain information that it is not reasonable to expect a proposer to have at the initial stage. Another view, where the proposal template has been fully adopted, was that it is in fact working well in practice and users appear comfortable with its requirements.

1.13. It was noted that each code retains individual differences in its processes. Principle 2 requires that codes use a consistent structure for modification related documents, with consistent templates and contents. Ofgem's view is that it is important to identify the degree of convergence that is expected by having these templates, and whether it may be beneficial to allow for some individual difference between the codes provided that the overall content and structure remained standardised.

1.14. Action (CAs): BSC and CUSC CAs will provide feedback on what they are presently doing differently and why, identifying the areas where the present template format does not work well in their processes. UNC has already provided their suggested revisions to the standard templates.

1.15. Action (Ofgem): agenda item noted for CAWG, to discuss with users what elements of the standardised processes and templates have been helpful in particular. To explore whether there could or should be flexibility built into the templates.

5. Issues raised in user feedback

1.16. A number of points of feedback were raised by users, forming the basis for discussion of best practice in the application of the CACoP principles. Some additional areas that the CACoP might cover have also been suggested.

1.17. CAs discussed their means of issuing notices of consultations. All CAs issue by means of a specific email to their distribution lists. Where applicable, other communication channels may be used, in addition to this, to ensure a broad audience.

- 1.18. User feedback was received on website usability. One CA noted that this feedback has been useful and has been acted on, for example to ensure that the relevant points of contact for certain issues are made clear.
- 1.19. CAs discussed the pre-modification processes being employed, in accordance with Principle 5. BSC and CUSC have not amended their existing process for this since the implementation of the CACoP, though they have introduced the cross-code forum. UNC have effectively renamed and broadened the process of their former 'Review Group' to encompass the CACoP principle on pre-modifications.
- 1.20. It was identified that not all CAs have a dedicated 'issue' group, though there are various routes through which users can raise issues. It may therefore be beneficial to explore best practice for CAs 'issue' processes, to ensure that these are clear and consistent for users, whilst retaining flexibility for the process as provided under the CACoP.
- 1.21. One CA noted that they are finding that the principle of simplification has not been achieved as in trying to align processes with the CACoP, and implement other Codes Governance Review changes, this has created added complexity. This point could be further explored in line with the review of the standard processes/templates.
- 1.22. One of the feedback responses suggested that the inclusion of timeframes for publishing modification and workgroup papers would be helpful. One CA also queried whether the indicative timeframes on page 21 of the CACoP were potentially confusing in their current form. Action (Ofgem): noted for inclusion in CAWG discussion.
- 1.23. A further issue was raised regarding a proposer's right to attend and speak at panel meetings, and whether the CACoP needs to clarify its reference to this. Action (Ofgem): noted for inclusion in CAWG discussion.
- 1.24. Action (Ofgem): consideration of whether the CACoP/templates should include reference to post-implementation reviews of code changes, and consideration of the review process under Principle 4 also to be discussed at CAWG meeting.

6. Next actions

- 1.25. Ofgem to prepare draft minutes and summarise action points.
- 1.26. Ofgem to coordinate a CAWG meeting to complete a review of the CACoP, and prepare an agenda for this. CAs requested that the notes of this meeting and responses to the initial feedback survey be published on Ofgem's website.

7. AOB

- 1.27. None – meeting closed