



Code Administration Code of Practice

User feedback form

The Code Administration Code of Practice (CoP)¹ was implemented on 31st 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 20th January**:

industrycodes@ofgem.gov.uk

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

Thank you

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

UNC BSC ~~CUSC~~ ~~Other~~

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

~~Code Administrator~~ Panel Member Code Signatory ~~Interested Party~~

* Please indicate in each of your responses which code your comments relate to.

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

Please share examples of any areas where you have found the application of the CoP Principles particularly successful. Please include any suggestions of 'best practice'.

Overall we have found the implementation of the CoP principles successful in the UNC. The introduction of timescales and the related KPIs are very useful to ensure all parties maintain reasonable expectations. The Critical Friend element has been well introduced, albeit we do believe that the Joint Office was already taking on a majority of this role prior to implementation.

On an administration level there has also been benefits from the new process in terms of the new easy to use forms for modifications and responses.

Please share examples of any areas where you have found the application of the CoP Principles particularly *unsuccessful*. Please include any suggestions for improvement.

We believe that one key unsuccessful area is the pre-modification process which, to date, we do not consider beneficial in comparison to the previous Review Group arrangements. Although it should be noted that we don't consider this to be the fault of the code administrator as such but is a flaw in the process itself. We do feel that Review Groups worked well and allowed structured and governed industry discussion on key topics from which many modifications have been produced and implemented. Whilst under the new arrangements parties are more likely to raise modifications containing options or which are underdeveloped which then lead to longer development time in Workgroups and more modifications being withdrawn. We do recognise that the Issues process was meant to aid in this area but due to the lack of governance it has left discussions in this area at lower priority than the formal modifications.

How useful do you consider the standardised processes, timetables and documents to be, as set out in the CoP?

Overall we have found the standardised processes useful, especially, as mentioned above, in terms of the set timescales and certain KPIs. We do recognise that this must be particularly useful for parties operating across the various industry codes.

Do you consider that the standardised processes, timetables and documents have been successfully implemented in the code(s)?

Yes, we do believe that the processes have been successfully implemented in the UNC.

In respect of Principle 1, which describes the role of Code Administrators as 'critical friends', if you are a code user, how would you evaluate the implementation of this principle in 2011?

As stated above we believe that the Joint Office have always fulfilled the role as a critical friend through their helpfulness and neutral stance on issues and this has only been amplified through the CoP implementation. We have for example seen recent modification being raised by smaller industry participants.

It should be noted however that the Code Administrators (CA) can only do so much to encourage e.g. smaller participants; if this is not used by the parties then this should not be seen as a failing of the CA.

Have you identified any additional areas that you feel it would be helpful for the CoP to cover? If so, please describe how you feel this would improve the code administration processes.

No

Are there any areas of the CoP that you have found to be inconsistent with other code processes? Please identify any specific examples.

No

Have you identified any parts of the CoP that you feel should be removed or amended? If so, please explain your reasons for this.

We do feel that the pre-modification principle could be further expanded to add more governance ensuring that it is utilised to its full potential. As explained above, we do feel that Review Groups were an efficient method to develop modifications and perhaps returning to similar arrangements should be considered.

Do you feel it would be useful at this stage to impose KPI targets on the Code Administrators (whereas currently KPI data is recorded, but no targets are set)?

No

We feel that where the CA can influence their performance (meeting minutes and reports etc) they are performing very well and so targets would not improve this already strong performance. It also would not be fair to impose targets on the CA on areas which are outside their control e.g. timescales of workgroup reports being completed.

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

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

Do you have any other comments?

No