



Consultation on code administration reporting metrics and performance surveys

Response from E.ON

General Comments

The current format of each industry code conducting its own customer satisfaction survey is not ideal. It requires significant time and effort from us and therefore we support the proposed approach from Ofgem of a single Code Administrator customer satisfaction survey and performance report.

Another issue that this should address is the apparent optimism bias that appears in the results of the current surveys. It seems odd that each industry code's administrators report indicates that they are the best performing compared to others. This can't be the case and undermines the value and credibility of the current arrangements.

Qualitative Customer Satisfaction Surveys

The use of an independent research company for the qualitative survey is something that we would support and has worked well to date.

We would suggest that Ofgem work with the current Code Administrators and Code Panels to determine the exact format of the survey. The outcome of this survey is important for the industry Code Panels. It is used to provide a view as to what areas of the service needs to be improved and to therefore help shape the forward work plans and budget setting processes for each Industry Code.

With regards to funding of the survey our preference would be for all Industry Codes to equally fund the activity (option 1). Although we have some sympathy with the logic that some of the technical codes which have less involvement from industry participants and therefore interest from the survey results should perhaps be excluded or pay less (these codes being CUSC, Grid Code, STC and the Distribution Code).



Quantitative Reporting Metrics

1. *Do you agree that the metrics set out in Appendix 1 will provide a useful set of data?*

Yes, this should be allowed to evolve over time as information starts to be collated and circulated and gaps are identified.

2. *Are there any other data that you consider should be reported on by the code administrators?*

Yes, the data suggested is a start but to provide a richer view of the performance of Code Administrators and the working of a specific Code it would be useful to include other information. This could include:

- The length of time a change proposal/modification has taken to be processed via the industry code from the date it was first raised to being voted upon.
- How many industry codes changes/modifications were approved, rejected and withdrawn.
- The length of time it has taken the Authority to determine upon modifications.

3. *Is there any additional guidance that is required such that the data provided is consistent across all code administrators?*

The guidance looked quite comprehensive although question 13 and 14, in relation to central system costs, is something that is quite opaque to most industry code administrators and industry participants (e.g. Xoserve or DCC costs) at the moment and therefore greater clarity on how this would be expected to be populated would be useful.

4. *Do you think there are any reasons why the code administrators should not continue to pay for the survey?*

No, the costs for code administrators are currently recovered from parties and therefore it is logical that this process should continue. We expect that overall costs to industry should reduce as a result of this proposal. The current arrangements see each code incurring the costs of an individual survey. In the future with only one survey these costs would be reduced as the costs are shared amongst all the codes.

5. *Which of the options set out in this document do you consider is the most appropriate way to fund the independent survey between the code administrators?*



Our preference would be for Option 1 although we see some logic in excluding those technical codes that have little engagement with a broad range of stakeholders (these codes being CUSC, Grid Code, STC and the Distribution Code).

- 6. Are there any alternatives to the options set out in this document of dividing the costs between the code administrators that you would favour?*

The option of Ofgem paying for the survey and recovering the costs via its current process for recovering its overall costs doesn't seem to have been considered. As Ofgem will be contracting and choosing the service provider there is some logic in this approach.

Ultimately the costs will be borne by Suppliers and their customers and therefore administration should be kept as minimal as possible. Having Ofgem invoice and recover funds from individual industry Codes would seem to introduce a level of bureaucracy and costs that could be avoided and therefore ultimate costs for consumers could be reduced.