

Telephone: 0121 288 2107

E mail: enquiries@gasgovernance.co.uk

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Lesley Nugent
Industry Codes & Licensing
9 Millbank,
London,
SW1P 3GE
industrycodes@ofgem.gov.uk

Dear Lesley,

Joint Office response to the consultation on the Code administrators' performance survey questionnaire

Thank you for the opportunity to provide a representation to the Code administrators' performance survey questionnaire. The Joint Office of Gas Transporters would like to offer the following comments for you to consider in relation to the scope and content of the survey.

The questionnaire scope is reasonably balanced and comprehensive covering the key stakeholder interactions, communications, provision of information, support, use of website, management of meetings, and raising modifications.

We would like to offer for your consideration a few comments and observations as below:

Reference to Xoserve (QS4 page 6 and page 9):

As the survey is intended to better understand code administrators' performance, the relevance of referring to Xoserve within the survey could be made more clear as this should help respondents to frame their answers to differentiate between pure code administration (a Joint Office responsibility) and code implementation/operation (Xoserve responsibility). It is appreciated that the intent of the questions on Page 6, 9 and 24 should eliminate parties completing the questionnaire in response to interactions with Xoserve opposed to the code administrator and the questionnaire provides an opportunity for comments about Xoserve interactions. However Xoserve's operations should not be confused with the distinct role the Joint Office of Gas Transporter operates as a Code Administrator and it may need to be reconsidered whether Xoserve should be included within the scope of the questionnaire.

Scope (Q1, Q2, Q3, Q4):

A respondent might object to you asking questions about their own organisation when the explicit purpose is to "...undertake a cross-code survey on code administrators' performance."

Terminology Used (Q7):

It is unclear whether Question 7 relates to organisations managing their obligations/operations under the respective code and/or their involvement with the administration process of code changes/modifications. It is our experience that, often, an organisation's regulatory team (code change) is separate from their operational staff. This question may benefit from further clarity in the first two phrases to distinguish between managing the day-to-day operational obligations set out within the code and the interaction with the code administrator to change the code.

Accession (Q8, Q9)

For the UNC, almost uniquely, this is an Xoserve responsibility; it is not clear from the survey that you are talking about Xoserve in this section.

Ratings (Q10, Q13, Q25, Q28)

We consider a 1-10 scale to be excessive and, without qualification, respondent's views are difficult to be used consistently and comparatively. It is our experience that, for instance, really good service ranges in scoring (on this scale) between 7 and 10, whilst it is rare to see scores below 3. At the very least, these questions would benefit from some supporting statements to encourage consistency in scoring.

Modifications (Q23)

We wonder whether the timeframe of "last 2 years" is appropriate; we would suggest that experience gleaned two years ago is not indicative of current performance, neither is it helpful to code administrators in identifying areas for improvement. We would instead propose 1 year.

Not raised modifications (Q27)

We think this question is too direct and might benefit from being less confrontational, such as: "Is there any particular reason why you have not..."

Hopefully you will find these comments helpful to you. Please do not hesitate to contact me should you have any questions.

Yours sincerely,

Helen Cuin (via email)
Joint Office of Gas Transporters
Tel: 0121 288 2107
Email: enquiries@gasgovernance.co.uk

UNC related documents can be accessed via our website: www.gasgovernance.co.uk