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1st December 2015

Response to the OFGEM Consultation: Code Governance Review (Phase 3) – Initial Proposals

Dear Marion,

I would like to thank you for this opportunity to respond to the initial proposals in the recent Consultation on Code Governance Review (CGR) (Phase 3). The MRA Executive Committee (MEC) note the consultation and its contents.

MEC is responsible for the day-to-day administration of the Master Registration Agreement (MRA) and as such have been fully engaged throughout the second stage of the CGR. MRA parties have put significant effort into developing the MRA and its processes as part of the CGR review, which took the opportunity to go beyond the prescribed scope of the CGR.

MEC note the proposed areas of reform within the consultation. A number of such areas have already been subject to review as part of the CGR work conducted under the MRA. MEC have discussed and identified some potential improvements within the scope of CGR3 and will support the work to further align industry codes. Given the MRA structure, self-governance model and existing processes, MEC would expect the impact on the MRA, and consequently MRA parties, to be relatively minor.

An area which MEC would request further clarity in, is regarding the independence of panel chairs, panel members and workgroup chairs. The MRA currently appoints an appropriate chair for the individual meeting or workgroup, including using meeting members and secretariat resource. MRASCo consider this chairing unbiased. The annual customer satisfaction survey includes some specific questioning on meeting management and no negative feedback has been received for this area. MEC also note that the perceived bias in panel membership was not identified as an adverse effect on competition in the Competition and Market Authority's (CMA) Energy Market Investigation.

If you would like clarification on any of the points raised in this letter or if there is anything else, you would like MEC to consider, please contact MRASHelpdesk@gemserv.com or call 020 7090 1029.

Yours sincerely,



Alex Travell

Chairman of the MRA Executive Committee