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Consultation on code administration reporting metrics and performance surveys

EDF Energy is one of the UK's largest energy companies with activities throughout the energy chain. Our interests include nuclear, coal and gas-fired electricity generation, renewables, and energy supply to end users. We have over five million electricity and gas customer accounts in the UK, including residential and business users.

We welcome Ofgem's final proposals to make the quantitative metrics reported by the Code Administrators clearer and more consistent across all codes. We also support Ofgem's proposals to commission an independent third party to undertake a cross-code survey and to publish the final report on Ofgem's website.

Our detailed responses are set out in the attachment to this letter. Should you wish to discuss any of the issues raised in our response or have any queries, please contact Mari Toda on 07875 116520, or me.

I confirm that this letter and its attachment may be published on Ofgem's website.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Mark Cox'.

Mark Cox
Head of Transmission and Trading Arrangements

Attachment

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EDF Energy's response to your questions

Q1. Do you agree that the metrics set out in Appendix 1 will provide a useful set of data?

Yes.

Q2. Are there any other data that you consider should be reported on by the code administrators?

Yes. In general, we think it would be useful to record the type of modification by category, e.g., governance, credit, metering, pricing and housekeeping, and record the timeline, i.e. how long each modification is taking to go through the process.

It would also be useful to record the number of modifications delayed by Code Administrators and the reason for the delay, e.g., the implementation of BSC modifications P297 and P321.

We would also find it useful if the total figure is provided under each reported metric.

Related to metric 8, we would find it useful if Code Administrators reported the number of modifications where the legal text was not available at workgroup vote. In practice, we think it is just as important to have the legal text available at workgroup vote as final consultation.

While we would not expect the Code Administrators to report on Ofgem's KPIs, it would be useful if the published report reports on this metric for completeness.

Separately, we have also considered the types of qualitative questions which could be asked by an independent third party.

- Do you consider that each Code Administrator with which you are familiar conducts itself impartially at code change workgroup meetings, without showing any signs of bias where the modification is, or may be, of commercial interest to its parent firm? (support with examples if possible)
- Have you seen any signs of administrative inefficiency in the operations of each Code Administrator with which you are familiar?
- Where code change proposals proceed through the workgroup, or Panel, more slowly than was expected, has this been in any case, due to poor Code Administration [as compared to a range of other unavoidable issues such as lack of available time in workgroup participants' diaries when trying to agree a date for the next meeting, or the need for analysis to address issues highlighted by consultees, Ofgem, or workgroup members] (support with examples if possible).

Q3. Is there any additional guidance that is required such that the data provided is consistent across all code administrators?

In relation to metric 10, where the number of times assistance was requested with access and engagement to the code and the modification process, it might be helpful to define what "assistance" means because it could range from a simple query on the telephone to extensive guidance and support over a longer period of time. Additionally, a mechanism to audit the reported figure may be necessary.

Q4. Do you think there are any reasons why the code administrators should not continue to pay for the survey?

No.

Q5. 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?

We do not have a strong view but Option 2, whereby the total cost of the survey is split equally between the six organisations that undertake a code administration function might be the most transparent and pragmatic option.

Q6. Are there any alternatives to the options set out in this document of dividing the costs between the code administrators that you would favour?

No.

**EDF Energy
April 2016**