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By email only to: industrycodes@ofgem.gov.uk

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Dear Marion

Code Governance Review (Phase 3) – consultation on code administration reporting metrics and performance surveys

Thank you for the opportunity to comment on the above consultation. This letter should be treated as a consolidated response on behalf of UK Power Networks' three distribution licence holding companies: Eastern Power Networks plc, London Power Networks plc, and South Eastern Power Networks plc – collectively referred to as "UK Power Networks". Our response is not confidential and can be published on Ofgem's website.

Our answers to the consultation questions are set out in the appendix to this letter and we hope that you will find our comments helpful.

If you have any questions, please do not hesitate to contact me.

Yours sincerely



James Hope
Head of Regulation & Regulatory Finance
UK Power Networks

Copy: Paul Measday, Regulatory Returns & Compliance Manager, UK Power Networks

Appendix

Code Governance Review (Phase 3) – consultation on code administration reporting metrics and performance surveys

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

Yes. The metrics set out in Appendix 1 are helpful and will provide a high-level view of code activity.

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

We have no additional data items to propose. However, we believe that it is appropriate to review reported items at the end of 2017, so that any changes required by the Code Governance Review have sufficient time to bed in.

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

We have not identified any additional guidance that should be provided to code administrators.

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

We are not aware of any reasons why industry parties should not continue to pay for the survey.

Question 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?

UK Power Networks favours Option 1 – that the total cost of the survey should be split equally between the administrators of the 11 codes listed in the CACoP. Each code panel will require access to the detailed responses related to a particular code in order to identify areas of improvement and better serve code parties. Furthermore, each code contracting body will require access to the detail as part of its role in managing its contract with the code administrator.

Question 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?

We have no alternative options to propose.