ElectraLink Ltd.
Ground Floor
Grafton House
2/3 Golden Square
London W1F 9HR

Tel: 020 7432 3000
Fax: 020 7432 3015

www.electralink.co.uk

Dear Lesley

Code Administrators' Performance Survey Questionnaire

ElectraLink provides Governance Services to the Supply Point Administration Agreement (SPAA), Distribution Connection Use of System Agreement (DCUSA) and Smart Metering Installation Code of Practice (SMICoP) as well as providing administrative services to the Community of Meter Asset Providers (CMAP) and facilitating the Distribution Charging Methodologies Forum (DCMF) on behalf of the Electricity Networks Association. All of our code administration services have been competitively procured, with commercial contracts stipulating clear performance standards and metrics. We welcome the opportunity to comment on the Code administrators' performance survey questionnaire.

ElectraLink fully supports the introduction of a cross codes survey. We believe that this is a positive step for the industry that will allow the performance of Code Administrators to be benchmarked, areas for improvement to be identified and best practice to be shared. At the same time, we are aware that there are significant divergences in the budgets and costs associated with providing code administration services. It is not clear from this questionnaire how these significant divergences in costs will be factored into the outputs of the survey, and so results will be on a comparable basis.

We have reviewed the proposed questionnaire and have noted that while the questions focus on the quality of service provided by the Code Administrators they give no consideration as to the widely differing budgets that the Code Administrators are working within. Due to differing budgets some Code Administrators have significantly more staff than others. Where this is the case we would expect administrators to provide a greater level of proactive support and engagement, which comes at a proportionally greater cost to industry. We believe that further work should be undertaken to consider how the outputs of the survey could be combined with the cost of delivering the code so that value for money could be identified and results compared on a like for like basis. We would be happy to work with Ofgem to consider how this could be represented.

For the survey to provide a fair comparison of Code Administrators there needs to be recognition within the questions, and possibly the introductory text, that the extent of services that that the Code Administrators are paid to provide differ from Code to Code. We urge Ofgem to consider this point and revise the survey to permit a fairer approach to measuring Code Administrators' performance.

In addition to the points above we believe that if Ofgem can normalize the results to take account of the different costs of providing code administration services – there should be an additional question asking respondents to assess their overall satisfaction with the codes that they interact with. We believe that this is best delivered through a scoring mechanism between 1-5 and will enable Ofgem and the industry to determine overall satisfaction.

We note that the survey makes a clear distinction between Xoserve and the Joint Office and we would like to ask whether consideration could be given to making a similar distinction between ElectraLink and Experian regarding delivery of the Theft Risk Assessment Service (TRAS). We have a number of parties with very limited interaction with SPAA and DCUSA that are required to engage due to TRAS. One of their main interactions will

ElectraLink Ltd

Registered No: 3271981. VAT Registration No: 698 2336 89. Reg Off: Ground Floor, Grafton House, 2-3 Golden Square, London W1F 9HR

ElectraLink Ltd.
Ground Floor
Grafton House
2/3 Golden Square
London W1F 9HR

Tel: 020 7432 3000
Fax: 020 7432 3015

www.electralink.co.uk

therefore be with the TRAS Service Provider, rather than ElectraLink. As ElectraLink is not involved in the service management of Experian, the quality of service delivered is outside of our control.

We would note that to provide comparability over years there is significant value in trying to limit changes to the questions over the years. From our own experience asking the same question over several years enables us to track trends and identify areas for improvement. We recognise that questionnaires should change in response to a changing market and greater understanding; however, from our experience it is better to introduce we questions rather than trying to amend existing questions so that comparability over the years can be maintained.

With regards to the individual questions, we would like to raise the following points for your consideration:

- ***If you are involved in more than 2 codes …***

  We note that based on the current wording a respondent could select that they engage with all of the codes, but could be asked to provide comments or views on the codes that they have least engagement with. We believe that this could skew the results of the surveys. Instead we believe that if codes are being randomly selected – then either these should not have been scored less than three, or the respondent should be asked if they are happy to provide comments on these codes or would prefer to provide views on another code.

- ***Q7 Which, if any, of the following best describes your current role in relation to the [INSERT CODE] code?***

  To enhance clarity for respondents, we would recommend the response that reads "I have an interest with the code as a panel member" should be amended to "I have an interest with the code as a panel/ working group/ committee member"

- ***Q10 - Thinking about all aspects of your dealings with [INSERT CODE ADMINISTRATOR] in relation to the [INSERT CODE], overall how satisfied are you with the service provided to your organisation?***

  As previously noted we are concerned that this question does not differentiate between the cost of providing code administration services. To address this, we believe the outputs of this question could be combined with the cost of providing the service to produce a satisfaction / pound result.

- ***Q11 - How does your Code Administrator proactively support you in your interactions with the [INSERT CODE] code?***

  We would note that the funding for engagement activities varies significantly across code administrators, and this question does not recognize this differentiation. We believe that this question should focus on what services customers want and how well each Code Administrator delivers those services that it does offer.

ElectraLink Ltd.
Ground Floor
Grafton House
2/3 Golden Square
London W1F 9HR

Tel: 020 7432 3000
Fax: 020 7432 3015

www.electralink.co.uk

- ***Q12 - And how do you proactively seek information or support from your code administrator in relation to the [INSERT CODE] code?***

  In the list of types of support provided by Code Administrators, "Help desk" should be one word to be consistent with Q11.

- ***Q13 - sing a scale ranging from 1 to 10, where 1 is Very Poor and 10 is Excellent, how well does your code administrator support you in your interactions with the …. [INSERT CODE] code?***

  We would suggest that respondents are asked if they have ever sought support from the Code Administrator and to rate the support received. This will ensure that the results are not skewed by respondents entering a low score in instances where they have never sought support.

- ***Q 18 - Thinking generally, about the information that your code administrator provides, how relevant is the information to you in dealing with the [INSERT CODE]?***

  Code Administrators that are funded to provide tailored support to individual market participants are likely to score better at providing relevant information. As an alternative approach, could respondents be asked whether they feel that the code administrator provides

- ***Q 19. To what extent do you agree or disagree with the following in relation to [INSERT CODE]:***
  c) I receive emails in a timely manner
  and
  Q 22. To what extent do you agree or disagree with the following in respect of [INSERT CODE]:
  b) I receive information in sufficient time before meetings

  For many of the Code Administration activities that ElectraLink undertakes, the timings to which we work towards are driven by our contractual arrangements with SPAA Ltd and DCUSA Ltd.

  We would urge Ofgem to take into account the impact of Code Administrators' contractual requirements when considering respondents' views on the timeliness of communications.

- ***Q 22. To what extent do you agree or disagree with the following in respect of [INSERT CODE]:***
  e) Teleconference facilities are fit for purpose

  We note that there is a specific question for teleconference facilities, but there is a not a separate question for webinar facilities. We believe that there should be a separate question for webinar facilities.

- ***Q 21. Have you attended a meeting or workshop about the [insert code] code(s) in the last year?***

  We believe that there should be additional questions asking respondents if they would like their code administrator to provide webinar facilities if they do not currently provide this.

- ***Q 23. Have you been responsible for raising any modifications in respect of [insert code] within the last 2 years?***

ElectraLink Ltd.
Ground Floor
Grafton House
2/3 Golden Square
London W1F 9HR

Tel: 020 7432 3000
Fax: 020 7432 3015

www.electralink.co.uk

We would note that previous questions have focused on interaction with the codes over the past 12 months; however, this question (along with question 27) focus on raising modifications in the last 2 years. We are unclear why a long time period has been adopted, and would note that if this is to be an annual survey this could prevent improvements made in the last 12 months being recognized in the survey. We believe this should be amended to 1 year.

- ***Q 25. Using a scale ranging from 1 to 10, where 1 is Very Poor and 10 is Excellent, how would you rate the help given by the Code Administrator in the development of your modification proposal in respect of [INSERT CODE]?***

  We note that the ratings that market participants provide in response to this question may be impacted by the contractual terms of the Code Administrator. Some Code Administrators are funded to draft CPs on behalf of customers, whilst others are only funded to provide limited guidance.

- ***Q 28 - Using a scale ranging from 1 to 10, where 1 is Very Poor and 10 is Excellent, how would you rate the support given by the Code Administrator in respect of [INSERT CODE] in helping you to understand what modifications raised by others mean for your organisation?***

  Similar to our comment regarding Q18, we feel that Code Administrators that are funded to provide tailored support to individual market participants are likely to score better at this question, as they are better resourced to provide help to market participants in understand what modifications mean for their organisations.

Thank you for the opportunity to provide our feedback. Should you have any questions, we would be happy to discuss our feedback further with you.

Please note, as this letter contains information about our staffing levels and contractual terms, we request that it treated as confidential and is not published on the Ofgem website.

Kind Regards

Stefan Leedham
Acting Head of Governance Services

ElectraLink Ltd

Registered No: 3271981. VAT Registration No: 698 2336 89. Reg Off: Ground Floor, Grafton House, 2-3 Golden Square, London W1F 9HR