Code Administrators Performance Survey

Connection and Use of System Code (CUSC)

National Grid Electricity System Operator (NGESO)

Introduction

As part of its 2016 Code Governance Review Final Proposals (Phase 3) (CGR3), it was concluded that Ofgem should commission a standardised cross-code study to monitor and assess the performance of Code Administrators in their role in respect to each code that they administer.

The study is now in its third year and is designed to evaluate the service provided by Code Administrators in accordance with the principles of the Code Administration Code of Practice (CACoP) which aims to align processes across the industry codes and identify areas of best practice.

The study is not intended to take account of the relative funding of the Code Administrators (CA), or whether they offer value for money.

In 2019, the study has been repeated to monitor performance and identify any developments. Specifically, the survey will be used to:

- **Identify:** Organisations' interaction with codes and CAs; including awareness of CA responsibilities, confidence in dealing with codes, and expectations of the service which Code Administrators should be providing.
- **Measure:** Overall performance of CA on key metrics, including overall satisfaction, support, communications and modification process.
- **Assess:** Specific aspects of service delivery, including email, websites, meetings and accession process.

Throughout the report, we will show data for 2017, 2018 and 2019 and draw comparisons as appropriate.

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- Email industrycodes@ofgem.gov.uk

We'll consider your request and aim to get back to you in 10 days.

Method

A mixed mode programme of research was conducted with organisations interacting with industry codes. The scope of the research included:

- Telephone discussions with Code Administrators prior to commencing the research programme. The conversations were designed to establish any major changes in service provision, thus allowing Future Thinking the ability to contextualise results from the 2019 survey.
- A mixed mode quantitative survey (online and telephone) with 203 participants to measure experience and performance of code administrators – **35 participants answering about the CUSC** (17 June – 12 July 2019).

- 25 follow-up in-depth interviews to get an understanding of drivers of satisfaction/ dissatisfaction (15 July – 8 August).

Throughout the report, results are shown:

At a total level (aggregated results for all codes)

At a total level for the CUSC (due to small base sizes, results are not broken down by subgroup)

Quotes from respondents included in the report are not intended to be representative of the range of views, but rather offer a range of opinions, feedback and suggested improvements

*Where base sizes are small, this is shown by an * for bases less than 30 and ** for bases less than 15. This indicates that the data should be treated with more caution and is indicative only.*

Industry context

The current structure and perceptions of the energy industry in which organisations operate are seen to have an impact on interactions and attitudes towards Code Administrators and should be taken into account when interpreting survey results.

Organisations acknowledge that the codes are necessarily complex and that the environment is challenging but believe fundamental changes in their administration could help to simplify processes and introduce greater consistency.

A key area for desired change in 2019 is reviewing CACoP with the belief that it can better serve customers by unifying Code Administrators. There is appetite among customers for CACoP:

- to have its own website.
- to deliver greater guidance to CAs on uniformity of information provision.
- to enforce levels of consistency around support provided through the modifications process.
- to provide weekly cross-code round-ups of forthcoming changes and expected impact on organisations.

While customers recognise the differences between codes, and the level of complexity associated with each, there remains a belief that simplifying and unifying operational aspects of codes would greatly assist CAs and the service delivery to customers.

There is also a preference for Ofgem to work more closely with CAs at earlier stages of modifications to avoid delays and further complications.

These wider external factors can influence how organisations perceive the service provided by individual code administrators.

Executive summary – CUSC

Overall, perceptions towards NGESO in relation to the CUSC show mixed performance vs 2018:

- Levels of satisfaction have decreased somewhat, and are now similar to those seen in 2017, with 43% satisfied overall (15 out of 35 respondents). Sixty percent (18 respondents) are satisfied with support from NGESO and 57% (17 respondents) with support when specifically requested.

- Having said this, overall perceptions show an increased proportion of organisations believing the service has improved vs the previous year, with 26% (9 respondents) citing service improvement in relation to the CUSC (vs 10% in 2018). The gains made in key satisfaction measures in 2018 possibly reflected in a longer-term improvement perceptions. Furthermore, improvements are also apparent with regards many factors associated with the CUSC meetings.

- A number of areas are however identified as in need of improvement:

   o Making it easier for organisations to interpret information from the Code Administrator, as well as understand email content and modifications.

   o The website is a key platform to address, with ease of finding information on the website continuing to be a key factor, but more critically that it is easy to understand (which has seen a large decrease in agreement).

   o A further opportunity (though of lesser priority) would be ensuring pre-meeting materials are received in sufficient time, and enabling active discussion participation.

Organisation profiling

The level of expertise organisations have to deal with codes remains consistent with previous years. However, availability of resource in 2019 has slightly declined. [1]

More generally, in 2019, there is some evidence of larger organisations indicating that they are having some resourcing challenges.

"We are a large company but we have some challenges. A lot of our employees are not in energy, so although we are large, when it comes to engagement, it is difficult."

SELF-REPORTED ORGANISATION'S SIZE

	No. of employees			
	0-49	**50-249**	**250-999**	**1,000+**
Total (203)	24%	15%	14%	45%
CUSC (35)	29%	14%	9%	49%

SELF-REPORTED ORGANISATION'S ENERGY MARKET EXPERIENCE

	0-5 years	**6-9 years**	**10+ years**
Total (203)	15%	7%	78%
CUSC (35)	17%	6%	74%

SELF-REPORTED SUFFICIENT ORGANISATIONAL EXPERTISE TO DEAL WITH CODES

NET: Agree

	%			2019	2018	2017
Total (203)	55	33	4 7 1	87	86	85
CUSC (35)	49	34	14 3	83	78	79

■ Strongly agree ■ Tend to agree ■ Neither/nor ■ Tend to disagree ■ Strongly disagree ■ Don't know
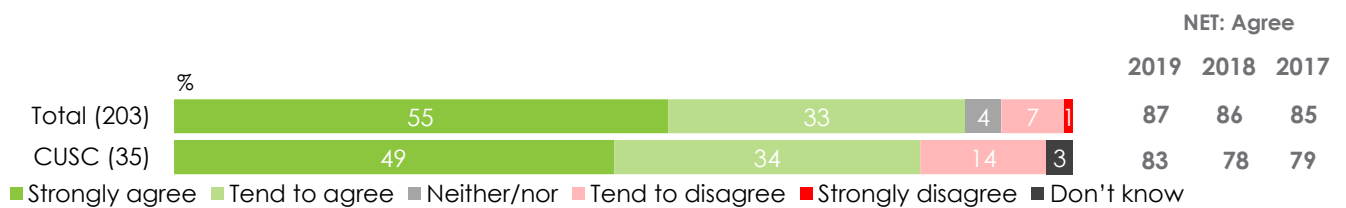
Q1. To what extent would you agree or disagree that your organisation has sufficient expertise to enable you to deal with the codes you are responsible for or interact with? Base: All responses for those involved with code (number of responses shown in brackets).

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[1] There is a weak correlation between an organisation's self-reported level of resource and overall satisfaction with Code Administrators. However, this does not imply causation.

SELF-REPORTED ORGANISATION'S RESOURCE

		NET: Agree	
	2019	**2018**	**2017**
Total (203): Strongly agree 28, Tend to agree 35, Neither/nor 12, Tend to disagree 20, Strongly disagree 5	**63**	**70**	**64**
CUSC (35): Strongly agree 11, Tend to agree 37, Neither/nor 6, Tend to disagree 37, Strongly disagree 9	**49**	**73**	**55**

■ Strongly agree ■ Tend to agree ■ Neither/nor ■ Tend to disagree ■ Strongly disagree ■ Don't know
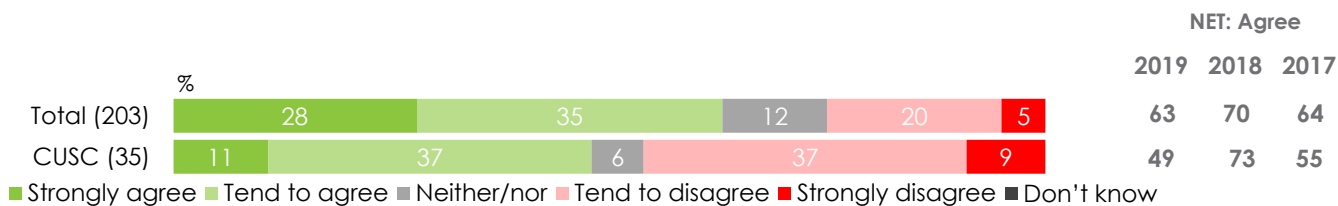
Q2. And to what extent would you agree or disagree that you have enough resource within your organisation to sufficiently deal with the codes you are responsible for or interact with? Base: All responses for those involved with code (number of responses shown in brackets).

Challenges around availability of resource impact both small and large organisations; any support therefore has to reflect the organisation's individual circumstance rather than size.
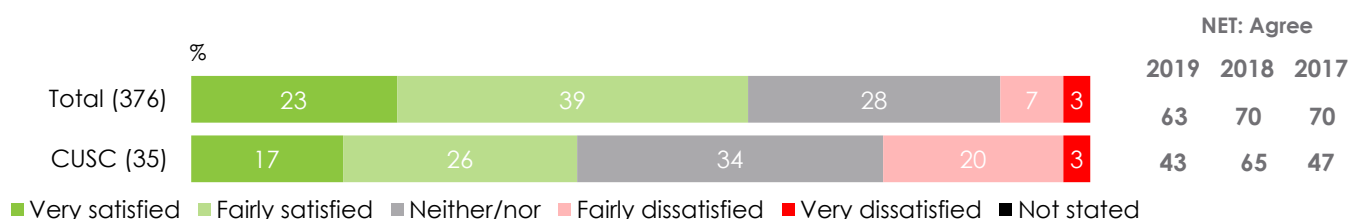
Key findings

KPIS

The survey collected four wide measures of satisfaction:

1. Overall satisfaction with the service provided to their organisation.
2. Satisfaction with the provision of support.
3. Satisfaction with support received when requested.
4. Perceived improvements from service received in the last year (introduced in 2018).

Overall, there is a positive shift in perceived improvements with the CUSC service, despite satisfaction scores decreasing, from highs seen in 2018, to levels now more in line with 2017.
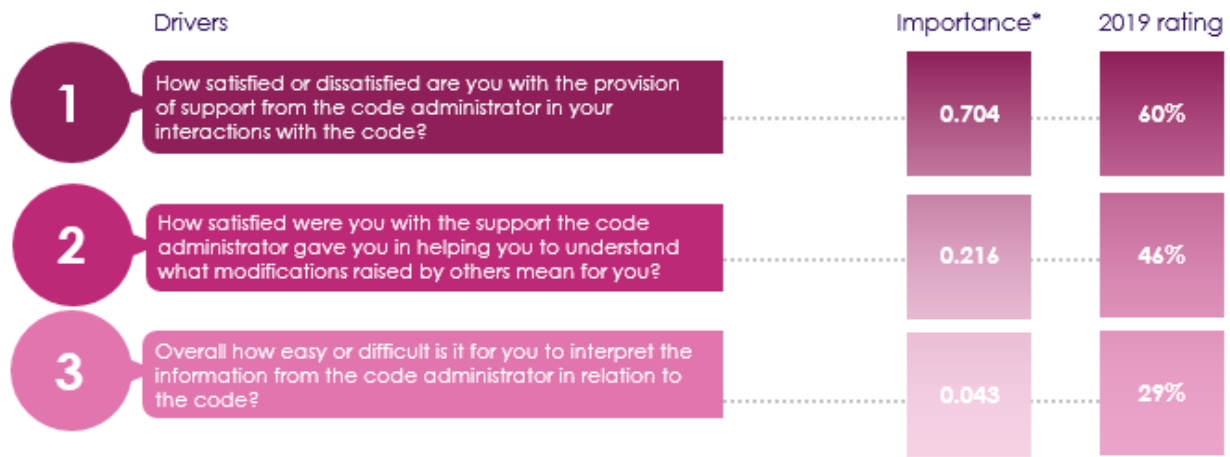
OVERALL SATISFACTION

At an all organisational level, we see a shift in reported overall satisfaction, down from 70% in 2018 to 63% in 2019. This decrease is mirrored for the CUSC service, though with a larger decrease in satisfaction for NGESO than the average; 43% are currently satisfied (15 respondents), similar to that seen in 2017.

		NET: Agree	
	2019	**2018**	**2017**
Total (376): Very satisfied 23, Fairly satisfied 39, Neither/nor 28, Fairly dissatisfied 7, Very dissatisfied 3	**63**	**70**	**70**
CUSC (35): Very satisfied 17, Fairly satisfied 26, Neither/nor 34, Fairly dissatisfied 20, Very dissatisfied 3	**43**	**65**	**47**

■ Very satisfied ■ Fairly satisfied ■ Neither/nor ■ Fairly dissatisfied ■ Very dissatisfied ■ Not stated

Q10. Thinking about all aspects of your dealings with the code administrator in relation to <this/these> codes, overall how satisfied are you with the service provided to your organisation? Base: All responses for those involved with code (number of responses shown in brackets).

To understand the aspects of service delivery that most impact overall satisfaction, key driver analysis (KDA) was conducted.[2] The aspects of service that have the greatest impact on overall satisfaction are:

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[2] KDA tests the strength of the correlation between ratings of core metrics against perceived level of satisfaction by which we can derive which factors have the greatest impact on overall attitudes – this is a subconscious measurement rather than a stated level of importance.

Drivers	Importance*	2019 rating
1 How satisfied or dissatisfied are you with the provision of support from the code administrator in your interactions with the code?	0.704	60%
2 How satisfied were you with the support the code administrator gave you in helping you to understand what modifications raised by others mean for you?	0.216	46%
3 Overall how easy or difficult is it for you to interpret the information from the code administrator in relation to the code?	0.043	29%

* The importance value will always have a value between -1 and +1, where, a large positive correlation means two ratings 'move together' and a negative correlation means the ratings move in the opposite direction. A correlation of 1 means an exact linear relationship (i.e. everyone gives the same rating for overall satisfaction as for provision of support.)
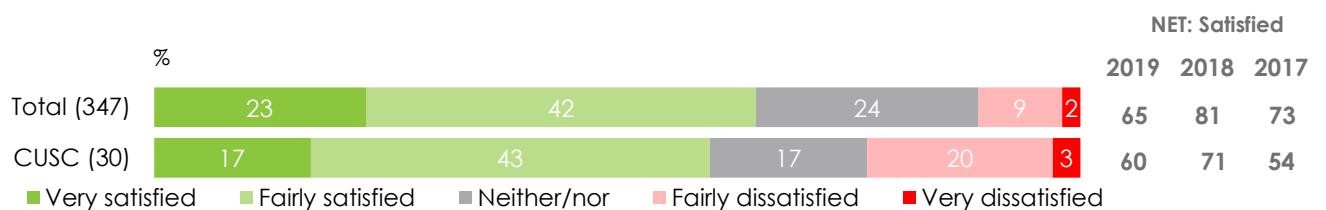
Due to the small base sizes, it is not possible to identify the key drivers for individual codes. The importance scores in the chart above are therefore based on the combined total for all codes and the 2019 current rating is specific to the CUSC.

At an overall level, the three key drivers of satisfaction continue to be around support and information. While provision of support is still the most important driver for satisfaction, it has become even more important (rising from 0.467 to 0.704 in 2019). It is however striking that the reported satisfaction around these key areas has dropped significantly at a total level as well as for the CUSC. There are opportunities to improve service around all the three key drivers of satisfaction. With service improvements to these core areas, it is likely that 2020 may see a positive lift in reported overall satisfaction.

SATISFACTION WITH PROVISION OF SUPPORT

After the strong uplift seen in 2018, 2019 sees a significant decline in reported satisfaction with provision of support from Code Administrators, and now stands at 65% (from 81% in 2018).

Satisfaction with the provision of support for the CUSC from NGESO has declined slightly this year, down from 71% to 60% (18 respondents). However, dissatisfaction has increased to 23% (seven respondents) and neutrality has decreased, creating a more polarising picture than seen previously.

	Very satisfied	Fairly satisfied	Neither/nor	Fairly dissatisfied	Very dissatisfied	NET: Satisfied 2019	2018	2017
Total (347)	23	42	24	9	2	65	81	73
CUSC (30)	17	43	17	20	3	60	71	54

Q11a/Q11c. How satisfied or dissatisfied are you with the provision of support from the code administrator in your interactions with the <code>? Base: All responses for those aware of support (number of responses shown in brackets).

SATISFACTION WITH SUPPORT RECEIVED WHEN REQUESTED

Again, we see a decline in satisfaction with support received when organisations request it. Overall, satisfaction is back to the 2017 level and stands at 72%. The same is apparent for organisations' satisfaction with the CUSC support received from NGESO when sought, with 57% (17 respondents) satisfied compared with 76% last year.

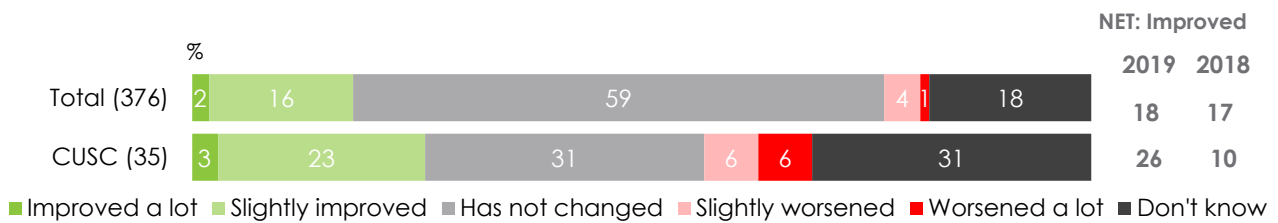|						2019	2018	2017
Total (331)	30	42	19	8	1	72	80	72
CUSC (30)	27	30	30	13		57	76	56

■ Very satisfied ■ Fairly satisfied ■ Neither/nor ■ Fairly dissatisfied ■ Very dissatisfied
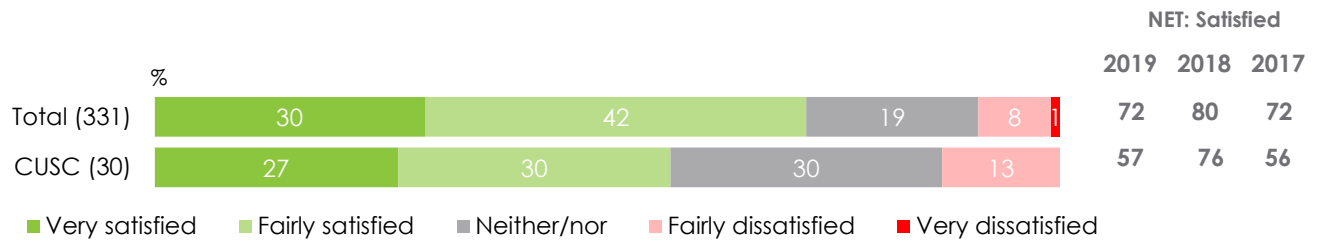
Q13/Q13b. And when you request support from the code administrator in relation to the <code> how satisfied or dissatisfied are you with the support you receive? Base: All responses for those proactively seeking support (number of responses shown in brackets).

PERCEIVED IMPROVEMENT

At an overall level, organisations tend to believe that the service they receive has not changed over the last year. In contrast, perceptions of service improvement for CUSC are increasing, with 26% (nine respondents) citing improvement (vs only 10% in 2018). However 12% (four respondents) state a decline in service provision.

NET: Improved

							2019	2018
Total (376)	2	16	59	4	1	18	18	17
CUSC (35)	3	23	31	6	6	31	26	10

■ Improved a lot ■ Slightly improved ■ Has not changed ■ Slightly worsened ■ Worsened a lot ■ Don't know
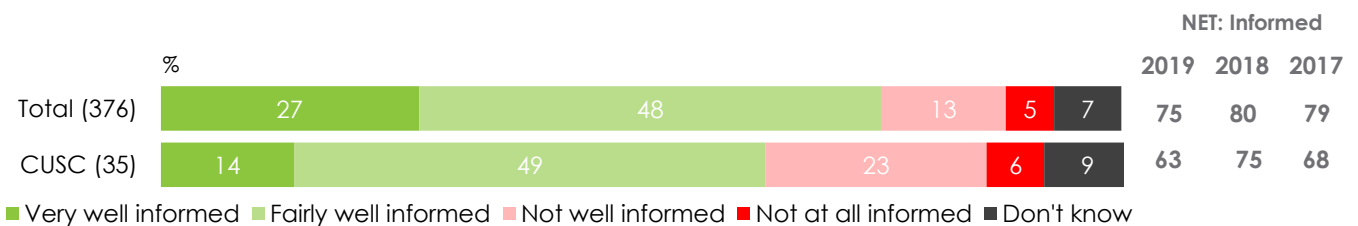
Q29b. Thinking about the service that you have received in relation to the <code> in the last year, would you say it has improved, remained the same or got worse? Base: All responses for those involved with code (number of responses shown in brackets).

Perceptions of information provision

On average, organisations claim to receive information about the CUSC from NGESO 1-2 times a week and for the majority, this frequency is about right (67%, 16 respondents out of 24 receiving information). Twenty one percent (five respondents) indicate that the frequency is not often enough.

KEPT INFORMED ABOUT THE CODE

Typically, organisations believe that Code Administrators keep them well informed about the codes; however there is a very slight decline in those feeling very or fairly informed (from 80% in 2018 to 75% in 2019). NGESO continues to perform relatively well on this aspect, although this has also seen a slight decline with 63% (22 respondents) saying they feel 'very' or 'fairly' well informed about the CUSC compared with 75% in 2018.

NET: Informed

						2019	2018	2017
Total (376)	27	48	13	5	7	75	80	79
CUSC (35)	14	49	23	6	9	63	75	68

■ Very well informed ■ Fairly well informed ■ Not well informed ■ Not at all informed ■ Don't know
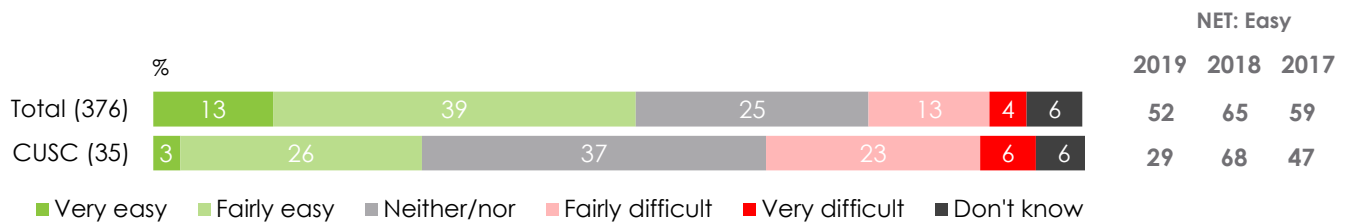
Q14/Q14b. How well do you feel your code administrator keeps you informed about the <code>? Base: All responses for those involved with code (number of responses shown in brackets).

EASE OF INTERPRETING INFORMATION

After the positive uplift seen in 2018, reported ease of interpreting information has declined. Overall, around half of organisations feel it is easy to interpret information from Code Administrators in relation to their codes.

Ease of interpreting information relating to CUSC shows a marked decline in 2019, with just as many finding it difficult to interpet as easy (29% in both cases, 10 respondents each respectively).

NET: Easy

	Very easy	Fairly easy	Neither/nor	Fairly difficult	Very difficult	Don't know	2019	2018	2017
Total (376)	13	39	25	13	4	6	52	65	59
CUSC (35)	3	26	37	23	6	6	29	68	47

■ Very easy ■ Fairly easy ■ Neither/nor ■ Fairly difficult ■ Very difficult ■ Don't know

Q15/Q15b. Overall how easy or difficult is it for you to interpret the information from the code administrator in relation to Base: All responses for those involved with code (number of responses shown in brackets).
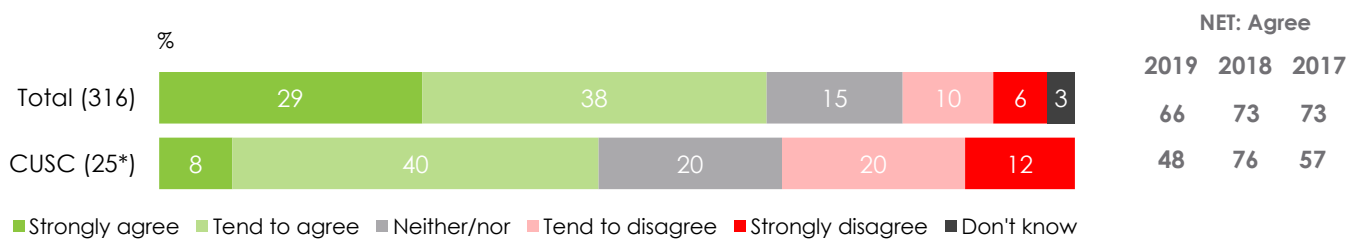
Perceptions of direct services

EMAIL

Organisations continue to be reliant on receiving information via email. It is generally perceived as accessible and provides a traceable audit trail. While organisations highlight some innovations that have made email communications from Code Administrators more manageable, there is a view that more can be done to streamline information sent via email.
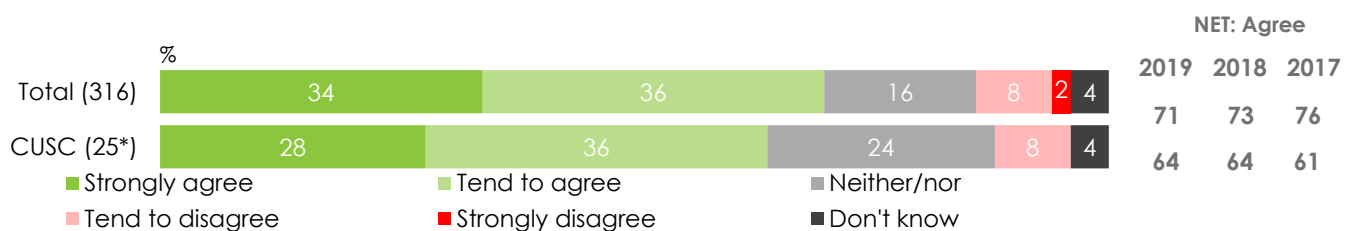
Organisations value email communications that are succinct, clear and give direction on the action (if any) that they may need to take as a result. Some organisations called for more dynamic provision of information; with email used to provide topline information and complementing digital platforms used as repositories for more detailed information.

For the CUSC, while a consistent 64% believe the emails are clear as to when action needs to be taken (16 respondents of 25 receiving such communications in 2019), there is a clear decrease in perception of ease of understanding, with less than half agreeing as such (48% - 12 respondents in 2019 - compared to 76% in 2018).

'The emails I receive are easy to understand'

NET: Agree

	Strongly agree	Tend to agree	Neither/nor	Tend to disagree	Strongly disagree	Don't know	2019	2018	2017
Total (316)	29	38	15	10	6	3	66	73	73
CUSC (25*)	8	40	20	20	12		48	76	57

■ Strongly agree ■ Tend to agree ■ Neither/nor ■ Tend to disagree ■ Strongly disagree ■ Don't know

'The emails I receive make it clear when action needs to be taken'

NET: Agree

	Strongly agree	Tend to agree	Neither/nor	Tend to disagree	Strongly disagree	Don't know	2019	2018	2017
Total (316)	34	36	16	8	2	4	71	73	76
CUSC (25*)	28	36	24	8		4	64	64	61

■ Strongly agree ■ Tend to agree ■ Neither/nor ■ Tend to disagree ■ Strongly disagree ■ Don't know

Q19. To what extent do you agree or disagree with the following in relation to the <code/codes>? Base: All responses for those receiving information from code administrator (number of responses shown in brackets).

Some organisations found the frequency of emails to be sufficient in keeping them informed. However, a concern was raised about the process of joining the mailing list:

"Information sent through is less frequent compared to other codes but when an email is received it's quite well structured in terms of explaining who a specific mod or process change will impact."

"They only communicate by email when it is necessary to do so – not bombarding you."

"One of my colleagues has had trouble getting on the mailing lists – very difficult – which list it is– we're all on the same list but get different emails. There is nowhere you can just sign up – you just get missed in that process."
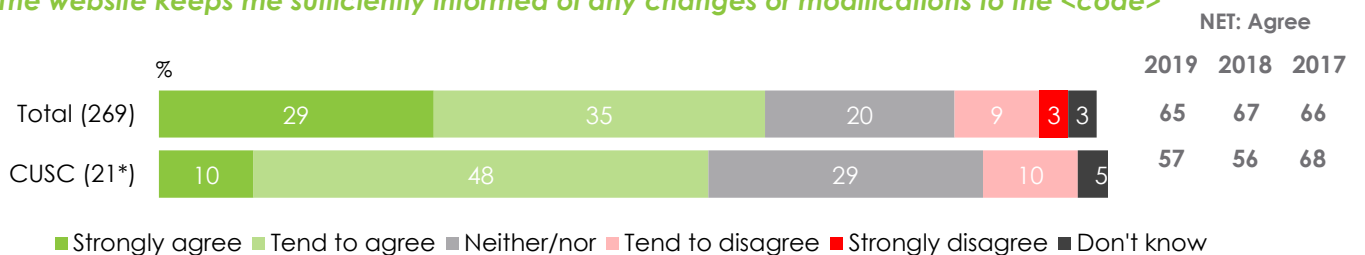
WEBSITES

Websites remain important for most organisations. They are seen as a vital resource for keeping up to date with various code changes and general information related to the code. Information included on websites can be insightful, providing businesses with the depth of understanding they require to navigate codes.

Customers feel it is critical that information that is on websites is kept up to date and is also easy to find. This continues to be an area that most Code Administrators need to work on; at an overall level, 61% indicate they are able to easily find information on the website.
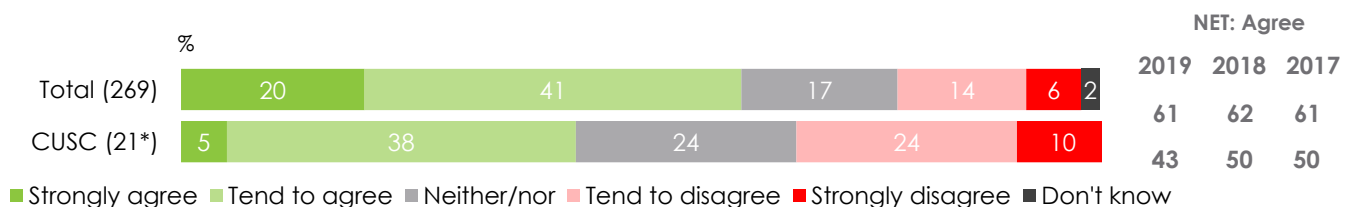
Opinion of NGESO's website (in relation to the CUSC) remains relatively consistent with 2018, with 57% (12 respondents out of 21 using website) agreeing it keeps them sufficiently informed of any changes or modifications to the code. Disagreement with the statement has almost halved, with just 10% (two respondents) tending to disagree that the website keeps them informed (vs 19% in 2018).

Organisations appear to indicate slightly more concern as to the ease of finding information on the website, with just 43% agreeing it is easy (nine out of 21 respondents). However, there were some positive comments about information accessibility on the website.

'The website keeps me sufficiently informed of any changes or modifications to the <code>'

NET: Agree

	2019	2018	2017
Total (269)	65	67	66
CUSC (21*)	57	56	68

Total (269): Strongly agree 29, Tend to agree 35, Neither/nor 20, Tend to disagree 9, Strongly disagree 3, Don't know 3
CUSC (21*): Strongly agree 10, Tend to agree 48, Neither/nor 29, Tend to disagree 10, Don't know 5

■Strongly agree ■Tend to agree ■Neither/nor ■Tend to disagree ■Strongly disagree ■Don't know

'I am able to easily find information on the website'

NET: Agree

	2019	2018	2017
Total (269)	61	62	61
CUSC (21*)	43	50	50

Total (269): Strongly agree 20, Tend to agree 41, Neither/nor 17, Tend to disagree 14, Strongly disagree 6, Don't know 2
CUSC (21*): Strongly agree 5, Tend to agree 38, Neither/nor 24, Tend to disagree 24, Strongly disagree 10

■Strongly agree ■Tend to agree ■Neither/nor ■Tend to disagree ■Strongly disagree ■Don't know

'The information on the website is easy to understand'

	NET: Agree		
	2019	2018	2017
Total (269)	64	68	70
CUSC (21*)	33	69	68

Total (269): Strongly agree 25, Tend to agree 39, Neither/nor 19, Tend to disagree 13, Strongly disagree 3, Don't know 2

CUSC (21*): Strongly agree 5, Tend to agree 29, Neither/nor 38, Tend to disagree 19, Strongly disagree 10

■ Strongly agree ■ Tend to agree ■ Neither/nor ■ Tend to disagree ■ Strongly disagree ■ Don't know
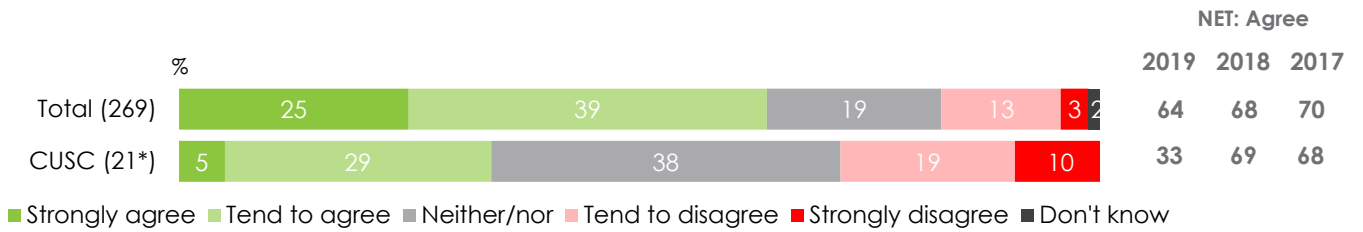
Low base

Q20. To what extent do you agree or disagree with the following in relation to the <code/codes>? Base: All responses for those using code administrator website (number of responses shown in brackets).

Whilst organisations highlight some concerns with aspects of the website, there are areas that are fit for purpose:

"I look at the CUSC website a couple of times a week. The search function for modification is good, I find it quick to get to where I want to go. The calendar function is really good as well: I can easily identify when the next meetings are and add those to my own calendar easily."
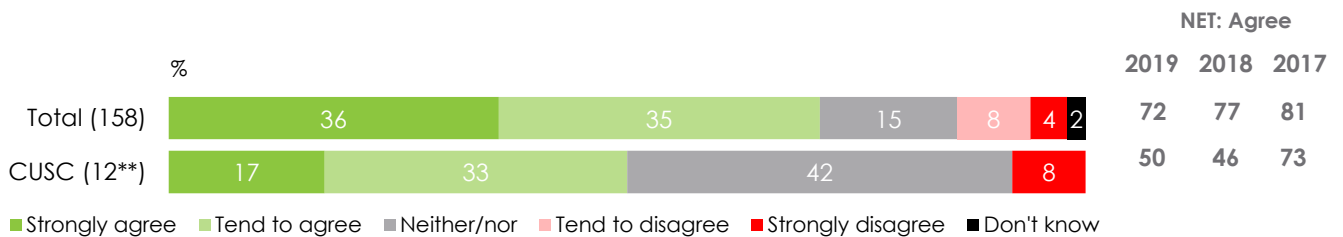
"You can look at meetings that were held previously. It also shows workshop groups: you can see what is happening. That's helpful for the Regulation department to know what is coming up."
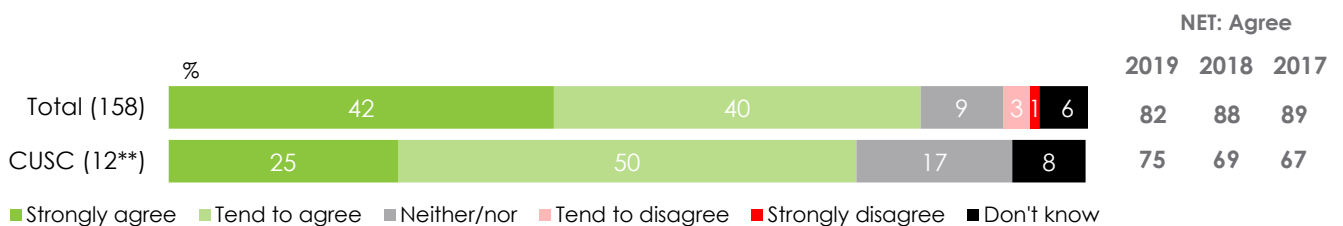
MEETINGS

At an overall level, 42% have attended a meeting or workshop in relation to the code they interact with. Thirty four percent of organisations involved with CUSC had attended a meeting or workshop in the last 12 months (12 individuals).

Although only a small number have attended a meeting, those attending CUSC meetings have shown slightly more positive views for most factors in 2019. This includes meeting and teleconference facilities being fit for purpose, and material received prior to meetings being sufficiently detailed. However, receiving the information in sufficient time (pre-meeting) and ease of active participation are opportunities for improvement.

'I receive information in sufficient time before meetings'

	NET: Agree		
	2019	2018	2017
Total (158)	72	77	81
CUSC (12**)	50	46	73

Total (158): Strongly agree 36, Tend to agree 35, Neither/nor 15, Tend to disagree 8, Strongly disagree 4, Don't know 2

CUSC (12**): Strongly agree 17, Tend to agree 33, Neither/nor 42, Strongly disagree 8

■ Strongly agree ■ Tend to agree ■ Neither/nor ■ Tend to disagree ■ Strongly disagree ■ Don't know

'Meeting facilities are fit for purpose'

	NET: Agree		
	2019	2018	2017
Total (158)	82	88	89
CUSC (12**)	75	69	67

Total (158): Strongly agree 42, Tend to agree 40, Neither/nor 9, Tend to disagree 3, Strongly disagree 1, Don't know 6

CUSC (12**): Strongly agree 25, Tend to agree 50, Neither/nor 17, Don't know 8

■ Strongly agree ■ Tend to agree ■ Neither/nor ■ Tend to disagree ■ Strongly disagree ■ Don't know

'It is easy for me to actively participate in the discussion'

	% Strongly agree	Tend to agree	Neither/nor	Tend to disagree	Strongly disagree	Don't know	NET: Agree 2019	2018	2017
Total (158)	38	42	14	4	1	1	80	82	88
CUSC (12**)	17	42	25	8	8		58	69	73

■ Strongly agree ■ Tend to agree ■ Neither/nor ■ Tend to disagree ■ Strongly disagree ■ Don't know
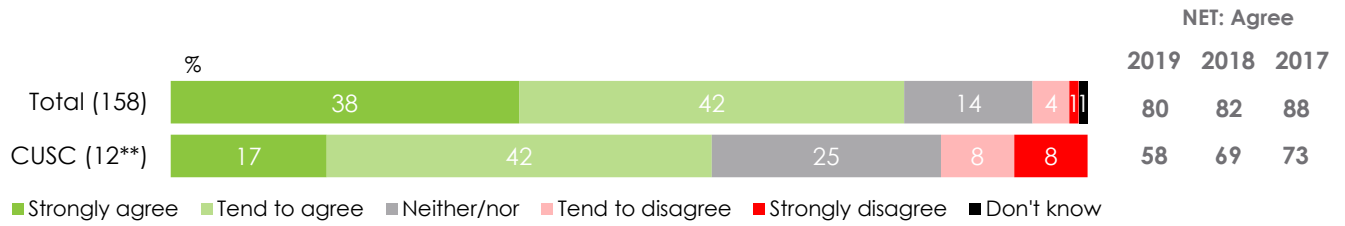
'The materials that I receive prior to the meeting(s) provide me with enough information about the objectives'

	% Strongly agree	Tend to agree	Neither/nor	Tend to disagree	Strongly disagree	Don't know	NET: Agree 2019	2018	2017
Total (158)	35	46	9	6	3	1	80	84	88
CUSC (12**)	8	67	17		8		75	62	87

■ Strongly agree ■ Tend to agree ■ Neither/nor ■ Tend to disagree ■ Strongly disagree ■ Don't know

'Teleconference facilities are fit for purpose'

	% Strongly agree	Tend to agree	Neither/nor	Tend to disagree	Strongly disagree	Don't know	NET: Agree 2019	2018	2017
Total (158)	22	42	17	9	2	8	65	60	56
CUSC (12**)		67	8	8	8	8	67	46	27

■ Strongly agree ■ Tend to agree ■ Neither/nor ■ Tend to disagree ■ Strongly disagree ■ Don't know

*** Very small base*

Q22. To what extent do you agree or disagree with the following in relation to the <code/codes>? Base: All responses for those attending meetings (number of responses shown in brackets).

Similar to last year, concerns have been raised around the location where the meetings are held:
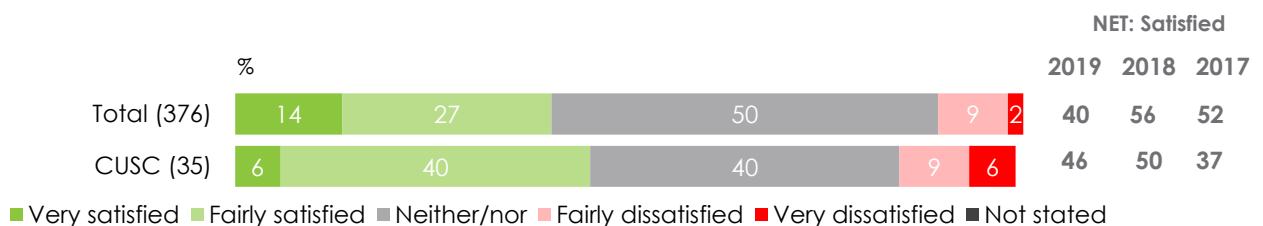
"They held all their meetings in Warwick which is very difficult to get to. They don't have appropriate conference call facilities so when you dial in you can't hear anything."

RAISING AND UNDERSTANDING MODIFICATIONS

Nine percent (three organisations) have raised CUSC modifications in the last 12 months. Two of the organisations found it easy, while the other felt it was difficult.

Overall, we see a decline in organisations saying they are satisfied with the support their Code Administrator gives them to understand what modifications mean for them.

Similar to the industry average, 46% (16 respondents) of organisations are satisfied with the support given by NGESO to help them understand CUSC modifications. A performance consistent with 2018.

	% Very satisfied	Fairly satisfied	Neither/nor	Fairly dissatisfied	Very dissatisfied	Not stated	NET: Satisfied 2019	2018	2017
Total (376)	14	27	50	9	2		40	56	52
CUSC (35)	6	40	40	9	6		46	50	37

■ Very satisfied ■ Fairly satisfied ■ Neither/nor ■ Fairly dissatisfied ■ Very dissatisfied ■ Not stated

Q28. How satisfied were you with the support the code administrator gave you in helping you to understand what modifications raised by others mean for your organisation? Base: All responses for those involved with code (number of responses shown in brackets).

There were a few specific concerns that organisations brought up.

"A couple of mod reports where they have been 100s pages –I know they are trying to record everything, but realistically am I going to go through it all."

"There is a feeling that the people who have been there for 20 years know exactly what's going on while others are trying to work the terminology all out and that's the area where I would like to see improvement."

"They are not lying but they put their own spin on it because of their commercial conflict, that doesn't always feel like it is an impartial and honest assessment."

ACCESSION PROCESS

Twelve people (36%) are employed by organisations who became party, or began the process to become party to, the CUSC in the last five years. Of those involved in the process, six of the twelve found the process easy with one finding it difficult.

Conclusions

The service provided by NGESO in relation to the CUSC has seen some positive and negative shifts from last year. More specifically, improvements are apparent for the service overall (increased perceived 'improvement'), as are the CUSC performance with regards to meetings management.

Conversely, there are also opportunities for service improvements, most notably:

- Ensuring information on the website relating to the CUSC is easy to find and understand.
- That information is easy to interpret, and email communication is easy to understand, including communication relating to modifications specifically.

A number of comments have been made relating to there being a conflict of interest with the National Grid holding more than one role. It is not clear, however, exactly what these concerns relate to or whether they are concerns about the split between the Transmission Owner and System Operation roles (which are now legally separated) or about the split between the NGESO's role as both the code administrator and a signatory to the code it administers. As such no conclusions have been drawn from these comments but we do recommend further investigation into the concerns about the conflict of interest.