



Code Administration Code of Practice

User feedback form

The Code Administration Code of Practice (CoP)¹ was implemented on 31st December 2010. The aim was to facilitate convergence and transparency in code modification processes. The CoP is formally adopted by the UNC, BSC and CUSC, and has been voluntarily observed by other codes.

In accordance with Principle 4, the CoP is subject to periodical review by users. In this first review, we welcome your feedback on how well the CoP Principles are being achieved in practice and any suggested amendments that you would like to raise for consideration.

Please provide your feedback by completing this form and returning your comments to Ofgem **by Friday 20th January**:

industrycodes@ofgem.gov.uk

If you would like any comments to be considered as confidential, please indicate this clearly.

Thank you

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Which industry code(s) are you actively involved with*?

UNC BSC CUSC Other

How would you characterise your involvement with the above code(s)?

Code Administrator Panel Member Code Signatory Interested Party

* Please indicate in each of your responses which code your comments relate to.

¹ A copy of the Code Administration Code of Practice can be found at <http://www.ofgem.gov.uk/Licensing/IndCodes/CGR/Documents1/FinalCoP.pdf>

Please share examples of any areas where you have found the application of the CoP Principles particularly successful. Please include any suggestions of 'best practice'.

We note that a relatively new element of the BSC Change processes relating to Proposer Ownership of Modifications (Principle 6) was implemented under the BSC via Modification P247 on 28 May 2010 (ahead of the implementation of the Code of Practice). We believe that proposers have welcomed this ownership.

We feel that Principle 1 (Code Administrators shall be critical friends) is an important principle and we have provided further views on this principle later in this response.

We note that, upon implementation, much of the Code of Practice broadly reflected existing custom and practice under the BSC. Taking this into account, and as a Code Administrator, we have not identified any areas of the Code of Practice which stand apart as particularly successful.

Please share examples of any areas where you have found the application of the CoP Principles particularly *unsuccessful*. Please include any suggestions for improvement.

We have not identified any examples where the application of the Code of Practice Principles has been particularly unsuccessful. However, we have noted that the standard application of a 15 business day consultation window (a guideline under Principle 10) has extended the overall time taken to consider Modifications under the BSC. To date we have not observed a rise in the number or quality of consultation responses and the range of respondents has remained broadly consistent.

How useful do you consider the standardised processes, timetables and documents to be, as set out in the CoP?

It is not clear to ELEXON how useful our customers find the standardised processes and timetables that are set out in the appendix to the Code of Practice.

The BSC and other industry Codes each contain the rights, provisions, rules and obligations that establish the specific change processes relevant to that industry Code. ELEXON publishes guidance on the BSC change processes which captures information relevant to the BSC processes defined under BSC Section F and BSCP40. In this context it is difficult to see how a general process in a Code of Practice can be definitive. Consequently, we believe it is important that the standard processes, if they remain in the Code of Practice, are seen as a guide rather than as the definitive detailed process.

Do you consider that the standardised processes, timetables and documents have been successfully implemented in the code(s)?

As noted in question 1, upon implementation, much of the Code of Practice broadly reflected existing custom and practice under the BSC. We therefore believe the BSC change process reflects the principles set out in the Code Administration Code of Practice.

In respect of Principle 1, which describes the role of Code Administrators as 'critical friends', if you are a code user, how would you evaluate the implementation of this principle in 2011?

As a Code Administrator we welcome feedback in response to this question.

Have you identified any additional areas that you feel it would be helpful for the CoP to cover? If so, please describe how you feel this would improve the code administration processes.

As Code Administrator for the BSC we have not identified any additional areas that should be included in the Code of Practice. Further, our customers have not informed us of any additional areas they may wish to be included in the Code of Practice.

Are there any areas of the CoP that you have found to be inconsistent with other code processes? Please identify any specific examples.

As the Code Administrator for the BSC we have confined our response to the BSC. In this context we have not identified any areas of the Code of Practice that conflict with other BSC processes. However, we note that the application of 15 business day consultations means that virtually all Assessment Periods extend beyond the standard three month period contemplated by the BSC and almost all Report Phase durations make use of the maximum period allowable as standard under the BSC.

Have you identified any parts of the CoP that you feel should be removed or amended? If so, please explain your reasons for this.

The templates referenced in the appendix to the Code of Practice are based on the BSC documentation that was in use when the Code of Practice was implemented. We believe that the templates should be seen as a guide in order to allow for continuous improvement.

Rather than defining templates the Code of Practice could outline the principle features of each document and the information that each document should contain (e.g. information on the front cover, content of executive summary, tabulated costs separated into implementation and ongoing costs etc).

Do you feel it would be useful at this stage to impose KPI targets on the Code Administrators (whereas currently KPI data is recorded, but no targets are set)?

ELEXON welcomes views on appropriate targets for the Key Performance Indicators. However, we recognise the difficulties in tracking performance of change processes where the number of repeatable events over a period is comparatively small. Furthermore, the complexities of each distinct issue contemplated via the change process means direct comparison between changes is challenging. There are several parties included within the processes considered by the KPIs so, while measurements can and should be made to record end to end performance, the granularity of KPIs must ensure that it is possible to detect particular issues with any part of the overall process. Successful targets would need to address these concerns to ensure consistency and relevance.

How would you rate your experience of the overall usefulness of the CoP?

CODE	Very poor	Poor	Neutral	Good	Excellent
<i>BSC</i>			X		
<i>CUSC</i>					
<i>UNC</i>					

As the Code Administrator for the BSC we have confined our response to the BSC.

Given that, upon implementation, much of the Code of Practice broadly reflected existing custom and practice under the BSC we feel the Code of Practice has had a neutral impact on the majority of the BSC. However, see comments below.

Do you have any other comments?

We believe that a Code of Practice is a useful and valuable tool to establish and maintain appropriate commonality across industry Code Administration.

It is important that a Code of Practice provides sufficient flexibility to improve and innovate. The specific rights, provisions, rules and obligations that define Code Administration processes should remain in the individual industry Codes – the Code of Practice should not mandate the detail of process steps. For example, we have built on Principle 1 (Code Administrators shall be Critical Friends) by scheduling a Cross Codes Energy Forum with National Grid to enable market participants to obtain updates on all relevant code Modifications at one meeting. This meeting has continued to evolve over the last twelve months to meet customer needs.

We believe that Principle 1 (Code Administrators shall be Critical Friends) is an important principle. As guardians of the process we continue to help users effectively frame and develop Modifications and we support the BSC Panel in setting Terms of Reference for Workgroups. We have a range of ways for our customers to engage in the BSC change process to facilitate active debate. Above all, we are committed to remaining impartial, constantly seeking to ensure that all views are articulated and taken account of when changes are assessed.