CACoP

Code Administration Code of Practice

2020 CACoP Report

Version 1.0
14 January 2021

ABOUT THIS DOCUMENT

This report provides a review of the work and output of the Code Administration Code of Practice (CACoP) Forum during 2020.

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1. INTRODUCTION

The CACoP was established following Ofgem's Code Governance Review in 2010. The purpose of the CACoP is to facilitate best practice and transparency in the Code modification processes while also helping to protect the interests of small market participants and consumers through the adoption of key Code administration principles. The CACoP is underpinned by 14 principles, which are available on Ofgem's website along with additional information regarding the CACoP.

As part of this, the Code Administrators have set up a Forum to meet and discuss cross-Code changes, facilitate joint working, discuss potential improvements to the principles, and consider additional methods to further the objectives of the CACoP. The Forum is here for energy Code Administrators to collaborate, share best practice and make navigation of all energy Codes easier for all industry participants.

The CACoP Forum has been established to allow Code Administrators to collaboratively:

- Identify cross-Code impacts from change and facilitate joint Workgroups, including:

  - Reviewing knock-on changes including recommendations and suggestions; and

  - Discussing impacts across multiple Codes;

- Share best practice for Critical Friend discussions;

- Strive for continuous improvements across the Codes and Code Administrators (outside of the Code(s) review);

- Innovative Code practices; and

- Enhance Code transparency.

2. CHAIR'S REVIEW OF 2020

In 2020 the CACoP Forum was chaired by Gemserv as the Code Administrator of the Independent Gas Transporters Uniform Network Code (IGT UNC).

2020 has been a challenging year as the industry has adapted to new ways of working in the wake of the coronavirus. The Forum successfully moved to meeting by teleconference in February 2020 and has continued to meet this way since. Indeed, all the Code Administrators swiftly and successfully moved to providing a fully remote service for their customers following the outbreak, with teleconferencing and remote participation capabilities made available for every meeting. All the Codes on the Forum continued to provide a full or near-full as possible service across the whole year, within the government's restrictions, supporting their Parties during this time.

Alongside this, the industry is in a period of great change, with several Ofgem-led Significant Code Reviews (SCRs) currently underway. Of particular focus to the Forum has been the Retail Code Consolidation (RCC) and Faster Switching SCRs. In November 2020, the Forum hosted a successful and well-attended online seminar on these two SCRs, focusing on what the changes would mean to Code Parties. The feedback from attendees was very positive, and the recording of the event is available via the Master Registration Agreement (MRA) website.

The Forum has also been committed to its founding principle of driving greater consistency between the Codes, particularly with the Modification procedures. Early in the year, the Forum members spent time sharing their best practices with each other. Over the subsequent months, the Forum reviewed the common Modification proposal form template, with enhancements agreed and rolled out to simplify these documents. Much progress has also been made in developing a central CACoP website, with this work expected to finish in the first half of 2021.

The Forum has also been examining how change impacts on consumers. In the Summer, the Forum was presented with a proposed approach for assessing the consumer benefits a Modification would have, which members were highly supportive of adopting. The Forum's agreed approach was captured in a guidance note that was subsequently rolled out in October 2020. The Forum will be reviewing this approach and looking further at the consumer in 2021.

The Forum set out several specific areas it wanted to work on at the beginning of 2020; its progress against these is discussed in the next section. Gemserv will continue to chair the Forum in 2021, as the chairmanship rotates to the MRA, and the 2021 Forward Work Plan has now been agreed by the Forum.

3.   REVIEW OF THE 2020 FORWARD WORK PLAN

At the beginning of 2020, the CACoP Forum agreed a Forward Work Plan setting out the activities it planned to achieve across the year. This section reflects on the progress made against each area.

SHARING BEST-PRACTICE FOR A MORE CONSISTENT CUSTOMER EXPERIENCE

The Forum acknowledged that there will always be differences in the underlying change frameworks due to the differing natures of the Codes and the stakeholders involved in each. For example, what works for a highly technical-orientated Code may not be appropriate for a highly governance-orientated Code. However, the Forum identified several service areas where it believed the approaches of different Codes can be shared to determine best practice that everyone can adopt. This would help to provide a more consistent service across all the different Codes.

Over the first three months of the year, the Forum convened a series of workshops exploring some of the differences between approaches take by Code Administrators. The areas discussed included:

- Comparison of modification processes, to identify areas of best practice that other Codes could adopt;

- Improving consistency in sharing information, such as by agreeing a common structure for the Modification Reports and the proposal forms for new modifications;

- Greater consistency in the provision of subject matter experts (SMEs) and Critical Friend support;

- Wider industry engagement, exploring other avenues that Code Administrators use for reaching out to a wider audience than those normally involved in the Modification processes. This included making consultations easier for participants to respond to; and

- Workgroup quoracy, noting it is becoming increasingly difficult to meet the quoracy requirements as there are too few Parties involved in the process. Different approaches to mitigating this were explored to help Codes suffering this issue.

Following the initial workshops, further sessions were held to review the common Modification proposal form template, resulting in a revised template being adopted in November 2020.

INVESTIGATE AND DEVELOP A CENTRAL CACOP WEBSITE

Following industry feedback in the 2019 CACoP Survey and the 2019 CACoP Engagement Day that Parties would be keen to see a central location for CACoP-related information, the Forum agreed to develop a central CACoP website.

The Forum has developed the requirements for this website and used this to secure a quote from developers. Using this information, the Forum has prepared and agreed a business case for taking the website forward. This document includes the likely costs, anticipated controls and ownership, benefits of having a central website, anticipated content, and a strategy to minimise any duplication

of effort. As the year ends, each Code Administrator is presenting this business case to its Code Panel(s), seeking agreement to contribute to the funding.

Completion of this website has been added to the 2021 Forward Work Plan, with implementation planned for the first half of 2021.

COLLATING INFORMATION AND GUIDANCE ON CODE PROCESSES

The Forum explored guidance notes providing Parties with a succinct summary of the different Code processes in a single place. It commenced work to define guidance on the market entry processes across Codes. Following its initial review, the Forum reassessed the value of such guidance at this time, considering this may form valuable material for a central website. The information produced was subsequently parked in May 2020.

Further work in this area is planned for the second half of 2021, following completion of the central CACoP website. This guidance can then be developed to form part of the content once the website is in place.

ENHANCING THE CENTRAL MODIFICATION REGISTER

Parties provided plenty of feedback on the Central Modifications Register at the 2019 CACoP Engagement Day, and the Forum introduced enhancements in response. In October 2020, the Forum reviewed these changes, and implemented further updates to better streamline and standardise the information provided. These changes were rolled out in the November 2020 update.

The Forum also reviewed whether the frequency of updates could be increased. It concluded that the effort and logistics required to update and publish the document more often would likely outweigh the benefits this would bring, and so agreed to continue updating once a month.

HIGHLIGHTING THE CACOP FORUM AND ITS PRODUCTS

The Forum continually reviewed how it is highlighting itself and its products, to ensure that Parties are aware this information exists and can find it as easily as possible. Papers and minutes of Forum meetings are all published on the IGT UNC website and distributed by Code Administrators to ensure the transparency of discussions and decision making at the Forum. Forum meetings are also open to Parties to attend as observers, although no Parties chose to join in 2020.

The Forum has continued to publish quarterly the newsletter introduced in 2019, which is distributed to a wide cross-section of Code users. The newsletter keeps Parties abreast of key cross-Code issues, upcoming events and Forum activity, and provides explanations of the CACoP Principles.

Following the development of the central website, the Forum will consider whether there is a more effective way to centrally manage contact information for Parties seeking to receive CACoP updates. The Forum will consider the requirements of the General Data Protection Regulation (GDPR), as well

as how the ownership of contact management processes may need to transfer between Code Administrators.

WRITING DOCUMENTS IN CLEAR AND PLAIN ENGLISH

The second CACoP Principle requires documents to be in plain English and understandable to all industry parties, which all Code Administrators fully support. Early in the year, all Forum members confirmed their intention to produce documentation that consistently meets the standards set out by the Plain English Campaign. The redesign of the Modification proposal form template also took the principles of the Plain English Campaign into account.

REVIEWING THE NUMBER OF MODIFICATION CONSULTATIONS

Some Codes require two consultations during the progression of a modification, while others only require one. Feedback was received from the 2019 CACoP Engagement Day on whether the number can be streamlined.

The Forum investigated this and concluded that the Code Administrators that consult multiple times do so because their Codes' modification procedures require them to. It acknowledged this difference but considered that raising the modifications needed to change this would not be a priority for the industry at this time, and so did not progress this further. The Forum's conclusions were included in the October 2020 edition of the newsletter.