CACOP

Code Administration Code of Practice

2023 CACoP Report

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ABOUT THIS DOCUMENT

This report provides a review of the work and output of the Code Administration Code of Practice (CACoP) Forum during 2023.

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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 the CACoP website along with additional information regarding the CACoP.

The Code Administrators that are subject to the CACoP have set up a Forum to facilitate regular meetings and discussions. Our main purpose is to achieve greater co-ordination and consistency across the Energy Codes and support the delivery of initiatives that benefit consumers and competition. Through the Forum we share and discuss ways of working, knowledge and lessons learnt to improve consistency between the Energy Codes' processes and approaches. We also identify and develop initiatives to improve the transparency and user participation in the Energy Code processes.

The Forum's chairmanship rotates through the member Codes at the beginning of each calendar year. This report reflects on the Forum's activities and achievements over the last year.



2. CHAIR'S REVIEW OF 2023

In 2023 the CACoP Forum was chaired by Gemserv, as the Code Administrator of the Smart Energy Code (SEC).

The Forum began this year by reviewing its purpose. The Cross-Code Steering Group (CCSG) is now formally established under the relevant Energy Codes to oversee cross-Code Modifications. As such, we took the opportunity to return the Forum's focus on being a more 'informal' discussion group, focusing on sharing knowledge, ways of working and lessons learnt. These types of items have often been considered the most successful and valued discussions by members, and we wanted to ensure these could be brought to the fore.

Supporting this approach is our dynamic work plan, where the Forum raises potential work areas and topics it wants to discuss as they arise. These are tracked and managed through the Forum's dynamic work plan, which is reviewed and published on a regular basis. You can keep updated with our work plan on our website here.

This year, we reviewed the CACoP document for any updates needed, and put forward two new Principles for inclusion which are currently with the Authority for approval. The first of these was to encourage Code Administrators to assess the impacts of a Modification on end consumers and on the drive for net zero. While we are already carrying out such assessments where we can, including this as a principle emphasises the importance of these areas at this time.

The second new principle recognises the support that Code Administrators can provide on the Code Reform and Consolidation work. This work will deliver significant change in the Energy Code governance arrangements over the coming years. The Code Administrators have a wealth of experience and insight into the current Code arrangements and change processes, and so are well placed to use this to collectively support this work and transition. Ofgem has already sought the Forum's views on Code Reform, and we will continue to work together on this going forward.

Additionally, the Forum has been using its meetings to actively input to other cross-Code pieces of work. We have provided collective support to RECCo's Open Data & Consumer Consent project, ensuring the input needed was provided and receiving updates on progress. The outcomes of RECCo's work will be of interest to other Codes in the future, who may want to undertake similar work. We also engaged with Ofgem when it was initiating its Future System Operator (FSO) Code Change Programme (CCP), inputting on the scope, membership and timeline of this work before it was formally launched.

2023 was the fourth and final year of Gemserv's period as the Forum Chair. In 2024, the Forum's chairmanship will rotate to the next Code alphabetically, the System Operator Transmission Owner Code (STC), which is managed by National Grid Electricity System Operator (NGESO).



3. FORUM ACTIVITIES AND ACHIEVEMENTS

This section covers the areas the Forum has discussed this year and the outcomes it has achieved.

REVIEW OF THE FORUM'S PURPOSE

At the beginning of the year, the Forum reviewed its purpose and updated its terms of reference.

Over time, the CACoP Forum had become seen by external Parties as the authority group for progressing cross-Code changes. However, with the CCSG now formally established under the relevant Energy Codes for that purpose, the Forum took the opportunity to return its focus to its original intent as a more 'informal' discussion and knowledge-sharing group. As such, the Forum agreed to place more focus on sharing knowledge, ways of working and lessons learnt, to help improve consistency between the different processes and procedures for the benefit of customers.

Alongside this, the Forum developed a more dynamic approach for its work plan. In previous years, the Forum would agree a work plan at the start of the year, setting out around half-a-dozen work items members proposed be progressed that year. This was replaced with a more flexible and dynamic approach. Rather than a single plan agreed once a year, the Forum implemented a dynamic work plan, where new items could be raised and added at any point. This has enabled more flexibility in the Forum's discussions and allowed it to continually review the items that can add value and ensure these can be prioritised.

Given the CCSG's purpose of reviewing and overseeing active cross-Code Modifications, the Forum agreed to remove these from its scope. This has improved efficiency and removed duplication by ensuring 'day-to-day' cross-Code change business is only discussed in one group. The Forum did consider whether the four Energy Codes not currently on the CCSG should become CCSG members, but ultimately concluded there would not be any notable benefit from this.

CACOP SURVEY AND NEW PRINCIPLES

This year the Forum undertook a review of the CACoP document and undertook a survey of its products and services.

The Forum has recommended two new Principles be added to the CACoP:

- The first new Principle would encourage the Code Administrators to consider the potential impacts on the end consumer and on the move to net zero arising from any Modification. These areas are becoming increasingly important and any impacts on these should be considered as part of the case for change. The Forum has previously developed a common approach to assessing the benefits of a modification on consumers; introducing this principle will reinforce this approach.
- The second new Principle will reflect the Code Administrators providing support and input to Ofgem on Code Reform and Consolidation. The Forum and Ofgem have discussed how the Forum can input on this work (see below); introducing this principle will help to formalise this engagement.



The Forum has also recommended some general changes to the document to better align wording across the Principles, update the common modifications timeline, and correct other minor errors and inconsistencies.

At the time of this report, the Forum's proposed changes are with the Authority for approval. This decision is expected in early 2024.

The Forum also surveyed its Code users for views on the products and services the Forum provides. Key products it produces include the <u>Central Modification Register</u> and the <u>Horizon Scanner</u>. It also issues updates to users via its regular <u>Newsletter</u> and its <u>LinkedIn page</u>. The survey only received one response, which supported the products and services the Forum provides. The Forum has concluded to leave its products and services unchanged going into 2024, though will review how it can better share its work and achievements with the Code Panels.

SUPPORT IN ESTABLISHING THE FSO CCWG

Ofgem has been working on the establishment of the FSO and is progressing with the CCP for this. A key part of this work will be undertaken by the dedicated Cross-Code Workgroup (CCWG), which will develop the Code changes required for this.

In the lead-up to the launch of the CCP, Ofgem engaged with the Forum to seek Code Administrators' input. The Forum held two dedicated sessions with Ofgem to input on the scope, membership and timeline of this work. All the impacted Code Administrators have also now joined the CCWG to engage in the ongoing work.

SUPPORT FOR THE OPEN DATA & CONSUMER CONSENT PROJECT

The Retail Energy Code Company (RECCo) has been undertaking its Open Data & Consumer Consent project, and the CACoP Forum has been supporting with this.

One of the workstreams under the project has been a review of the metadata for the data sources governed under the Retail Energy Code (REC). This involved identifying which Code owns each data item, and then liaising with the Code Administrator to confirm the metadata description is correct. The Forum supported RECCo with identifying the right people to attend a workshop and contribute to this work, ensuring that input was provided in a timely manner to support cross-Code collaboration. This stream of work is now in the process of being implemented. The Forum will look at the outcomes of this work once implemented, to see if there would be benefit in other Codes carrying out a similar exercise.

INPUT ON CODE REFORM

The Code Reform and Code Consolidation programmes will deliver major change to the Code governance arrangements, with Code Administrators and Code Panels being replaced by Code Managers. The current Code Administrators have a wealth of experience and insight into the current Code arrangements and change processes, and so are well placed to use this to collectively support



Ofgem with the development and delivery of these major changes. The Forum can also co-ordinate and progress initiatives under the current arrangements that will support the principles and aspirations of this work. This engagement is being further emphasised through introducing a proposed new CACoP Principle (see above).

Ofgem and the Forum have discussed Code Reform over the last year. With the next major round of engagement on this work expected in early 2024, the Forum will be well placed to provide valuable input.

INDUSTRY CODE DIAGRAMS

In response to customer feedback, the Forum prepared a set of Industry Code diagrams. These provide an illustrated view of the relationships between the various Licences, Energy Codes and Market Participants in the Great Britain (GB) electricity and gas arrangements. These will aid users in navigating which Codes they need to be a party to depending on their role in the industry.

These diagrams can be downloaded from the CACoP website here.

CACOP WEBSITE

The Forum launched its <u>central CACoP website</u> in 2022. This website brought all the CACoP documents, products and information together in one place, rather than having these all split over the different Codes' websites.

The Forum reviewed the website's usage. It concluded that some products such as the Horizon Scanner would benefit from some further publicity to bring these to Code users' attention. The website layout was also amended to better highlight the Latest News and Newsletter sections. The Forum will continue to monitor the website for any further improvements that can be made and welcomes any feedback from users.

SHARING APPROACHES

The Forum has discussed several areas of best practice, which have included the following areas:

- Members discussed approaches for preparing legal text for Modifications, noting that comments received from Workgroups can be late or contradictory. Lessons learnt by other Codes included online document management, master versions and working more digitally.
- The Forum discussed whether there was benefit in co-ordinating the questions and timings of their customer surveys following the announcement there would be no Ofgem-led cross-Code survey in 2023. The Forum did look at whether common questions could be developed but noted that each Code already has sets of questions that are relevant to how each operates, and that keeping these unchanged helps with year-on-year comparisons. Additionally, some organisations' customer surveys are wider than just the Code Administration function. At the time, the Forum saw little overall benefit from aligning these



- questions. It will reconsider this again in the coming year following Ofgem's announcement it will not be carrying out its survey in 2024 either.
- The Forum considered a proposal to remove thermal technology types that are embedded in various Codes. The Forum agreed a consistent approach to removing these would be beneficial, and the impacted Code Administrators agreed to discuss this further outside the Forum.