ESO Code Administrator Code of Practice (CACoP) survey results

Context

As the ESO we administer changes to the Grid Code, Connection and Use of System Code (CUSC) and System Operator Transmission Owner Code (STC). Ofgem annually commission a Code Administrators Code of Practice (CACoP) industry survey to understand industry trends and code administration performance across the 13 energy industry codes. This paper gives an overview of the CACoP survey results relevant to ESO Code Administration and our views and actions on the back of them.

How many modifications have we facilitated over the last 12 months?

In the last three years the number of modifications in the codes that we administer has grown significantly; we've administered more modifications this financial year than the past 6 years.

Due to the unprecedented number of modifications, it has been difficult for us to move these quickly and efficiently through the process. We know this is something that has frustrated our stakeholders and we've now increased our resource in this area to help improve the service we provide

Modifications raised in which the ESO administer
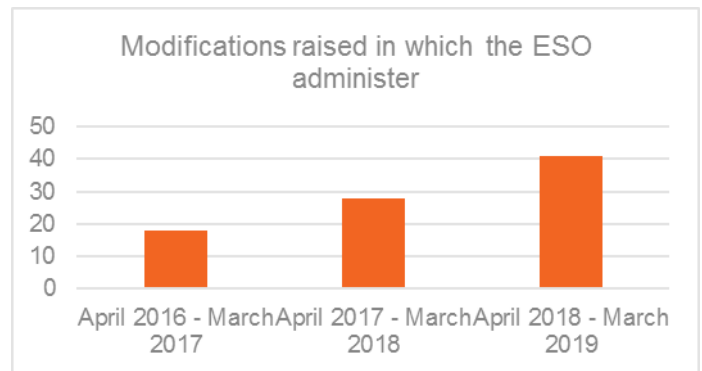
	2019, year to date	Financial Year (Apr 18- Mar 19)
Modification raised	39	41
Workgroups facilitated	91	67

What have we improved over the past 12 months?

Our electricity codes are critical to the efficient running of the electricity network and continuing to deliver consumer value. We play an important role as code administrator and we are focused on delivering an improved service. Over the past year we have made the following improvements:

- **Incremental website improvements** – To date we have focused on incremental changes. We have improved our Codes home page to explain more clearly our role in the code change process. We have also added a new improvements page with several new products to keep stakeholders informed about code change.

- **Critical friend improvements** – the ESO raised and implemented mod CMP313 GC0124, CMO73. This provides additional time to provide greater critical friend advice, in line with other code administrators, when new modifications are raised.

- **Education webinars for new modifications** – we have begun to hold education webinars for more complex modifications after they have been raised. This has helped users to better understand the purpose of the modifications, how it could impact them and if they should join the workgroup. To date we have conducted 5 webinars with an average rating of 7.6 out of 10.

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- **Introduced summaries after each working group –** we have introduced high level summary documents for each of our new modifications on the website. This was an action to help stakeholders understand the often-technical information presented in a full report quickly and easily.
- **Improved FAQs and guidance** – we have improved our guidance information on our website including setting out how parties can get involved in the code modification process

ESO Code Administration CACoP results

What is the CACoP survey and what were the results?

As part of its 2016 Code Governance Review Final Proposals, it was concluded that Ofgem should commission a standardised cross-code study to monitor and assess the performance of Code Administrators. There are significant differences between the commercial models of the Code Administrators as well as the content matter of the individual codes and therefore the level of service provided cannot be directly compared. A summary of the results can be found in the chart below:

Overall how satisfied are you with the service provided to your organisation? (net satisfied %)
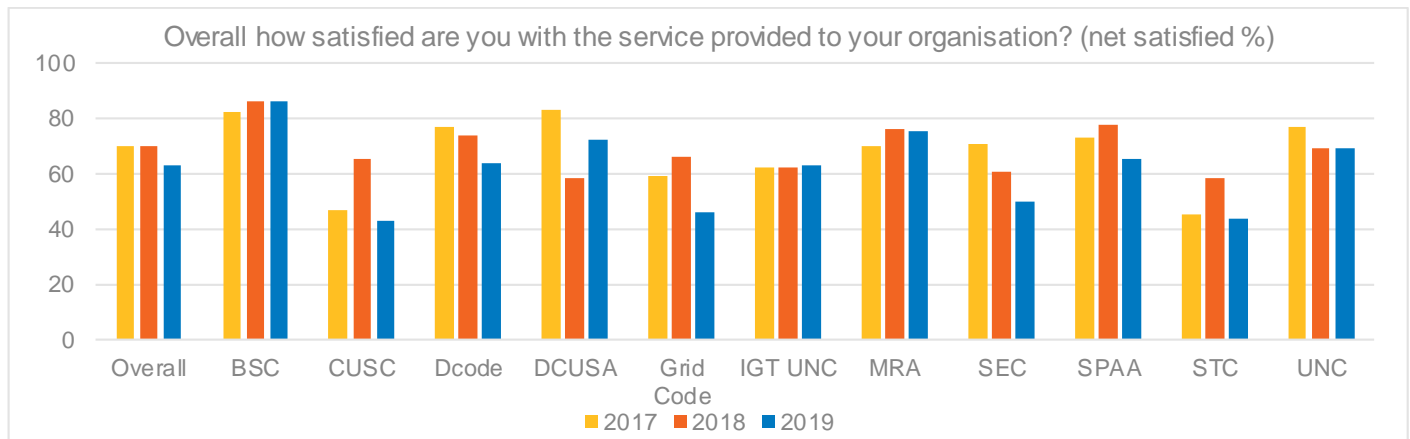
While there is a general trend of reduced satisfaction across the codes overall, we recognise that there are some stark reductions for the codes that we administer.

	Grid Code	CUSC	STC
2016/17	59	47	45
2017/18	66	65	58
2018/19	46	43	44
Last year trend	-20	-22	-14

What are the main ESO findings from the report?

Reduced industry resource - The survey has highlighted an overall trend of decreased resource across industry. Code Administrators are being challenged further to fill the gap with better communications and a more tailored service such as increased access to free legal and analysis support.

This trend is more acute for the codes that we manage with industry noting a ~20-point decrease in the amount of resource as highlighted in the table below. This has been clearly evidenced in the challenges we have had in gaining quorate meetings, which has resulted in modification delays. This may be explained by the significant regulatory changes in our code areas, for instance Ofgem's electricity network charging reviews which are taking considerable industry resource.

Year on year change (2019 vs 2018)		
	Industry view on sufficient resource	Industry view on overall satisfaction
Overall cross industry	-7	-8
CUSC	-17	-22
Grid Code	-20	-20
STC	-25	-14

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ESO Code Governance is not acting independently - It is not entirely clear if the concerns are with perceived conflicts of interest between ESO and National Grid Electricity Transmission or with conflicts within the role of ESO. For either of these concerns we believe more work needs to be done in explaining the motivations for our decisions and how, across the code change process, these are aligned with delivering consumer benefit.

Website improvements – It is clear that stakeholders do not believe the website is as up to date as it could be and that information can be difficult to find. Improving our website is a priority - we've made some changes to the website already and will continue to listen to stakeholder feedback to make future improvements.

What is the ESO Code Administration focus going forward?

We are disappointed that the CACoP survey scores for the codes that we administer have decreased. While we have implemented several improvement activities over the past 12 months, and increased the resource to support code administration, these have not translated into the increased service provision that industry expects.

We will continue to focus on improving the Code Administration service that we provide to industry, listening to what our stakeholders need and responding to their feedback. The code administrator improvement plan and improvements activities are now integrated with our overall ESO forward plan for improvements. Our plans include getting the basics right through website improvements, better guidance documentation, focus on quality and improved communications by taking the lessons from the team's lead secretariat role for Charging Futures.

We are currently prioritising the feedback from the CACoP survey, in terms of what matters most to our stakeholders. We will share more detail about what we are doing to improve in the next ESO Forward Plan, which will be published in December.

However, we have identified some immediate improvements that we will be working on over the next four months:

1. **Information provision and use of our website** - we have already made improvements in terms of navigating the website and making sure information is in the right place. However, we recognise that there is more we can do and had planned to make additional improvements towards the end of Q3 19/20. In light of the CACOP feedback we intend to form a larger scale project to review and improve the overall website and with the aim to implement by the end of the financial year

2. **Clearer information in modification reports** - we consistently receive feedback on the complexity of our modification reports and other documentation. We recently held an internal workshop to review and further standardise our documentation. This focused on stakeholder feedback and best practise within the industry. We look to pilot a new approach towards the end of Q3 19-20 and will be asking stakeholders for their feedback on a proposed new approach.

3. **Use of executive summaries to aid readers short of time** feedback has also centred on better use of executive summaries to better understand modifications and impacts on industry. We are will be piloting the use of executive summaries in our documents in Q3 2019/20. Again, we welcome feedback once our stakeholders have had the opportunity to review them.