

By email to: industrycodes@ofgem.gov.uk

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Dear Lesley,

Consultation on code administrators' performance survey questionnaire – ELEXON Response

We welcome the opportunity to comment on the draft code administrators' performance survey questionnaire.

As you are aware, ELEXON is the code administrator for the Balancing and Settlement Code (BSC). However, our remit extends beyond basic code administration. We are responsible for managing and delivering the end-to-end services set out in the BSC. This includes responsibility for the delivery of balancing and imbalance settlement and the provision of assurance services to the BSC Panel and BSC Parties. We manage not just the assessment, but also the development and implementation of changes to central systems and processes.

The views expressed in this response are those of ELEXON Ltd, and do not seek to represent those of the BSC Panel or Parties to the BSC.

Support for customer feedback and performance measurement

ELEXON supports Ofgem's focus on the service quality and performance of code bodies. We keep our services under continuous review and our commitment to customer engagement and continuous improvement is embedded in our strategic priorities (as set out in our [business plan](#)).

We are committed to measuring our performance against our customers' expectations. We monitor the metrics that are currently set out in the Code Administration Code of Practice (CACoP) on a quarterly basis and we seek feedback on the services we provide through our own, independent, annual customer survey.

Our survey (which we have run for more than a decade) is an important way of finding out exactly what our customers think of us, what we do well and where we need to improve. It is carried out on our behalf by an independent, professional market research company.

The survey comprises both quantitative (scores plus free form comments) and every other year, qualitative (face to face interviews) elements. It is entirely confidential and anonymous. A summary of the results is published on our website. The data is fed back to us on that basis by our independent service provider. This independent process is invaluable in helping us to maintain and improve our services.

We are very proud that [our latest \(2016\) results](#) show our highest ever scores for Customer Satisfaction and for Net Recommendation. We discuss the results with the BSC Panel, and our customers and publish them on our website.

Mitigating the risk of perpetuating multiple surveys

We recognise the burden that multiple surveys can place on customers and we have continued to refine the content of our survey to make it as easy as possible for our customers to share feedback on our performance.

We support any move to improve the way in which feedback is gathered and used which reduces the burden on customers. However, in order to mitigate the need for individual code bodies to commission their own surveys, we believe that any centralised survey must meet the needs of all code bodies for gathering and receiving feedback from their customers in relation to their services (which, in some cases, extend beyond code administration).

We recognise the challenge in creating a comprehensive survey that is sufficiently concise so as to be completed without it becoming a burden on those that are invited to participate.

Consequently, we will consider the need to commission our own survey in 2017 based on the scope of this central survey and the feedback we receive through this central mechanism. The following section highlights key areas which we find valuable in our survey and which we believe should be included in your questionnaire.

Comments on the questionnaire

Administration or delivery: We note that the questionnaire makes the distinction between the code services provided by the Joint Office and Xoserve. It confirms that respondents should answer questions in relation to the performance of the Joint Office, not Xoserve. It is not clear, however, whether a similar distinction is being made in relation to BSC services – i.e. whether the questionnaire is seeking views on only the code administration services provided by ELEXON or whether respondents should also take into account the wider aspects of our role which include the management and operation of settlement systems and the delivery of assurance services. We believe this is an important distinction that should be acknowledged. We also recognise the challenge this distinction poses in developing a comprehensive, yet concise, questionnaire that can compare code bodies on a like-for-like basis.

Questions on value for money, expertise and professionalism: We have previously noted the general direction of travel away from passive code administration to pro-active code management as expressed in the CMA's energy market investigation and Ofgem's third review of industry code governance. We are therefore surprised that the survey contains no explicit reference to value for money, expertise or professionalism in the delivery of code administration services. These are areas we have consistently sought feedback on. We believe they are important features of a good code management service and should be included in this questionnaire.

Questions on overall satisfaction: We welcome the assessment of overall satisfaction (provided by Question 10). We believe that further value could be realised by rating key aspects that might drive any satisfaction score. Areas that we consider in our current survey (scoring each on a scale of 1 to 10 in relation to overall satisfaction) include:

- Being flexible
- Overall professionalism
- Being highly efficient
- Overall quality of communication
- Keeping costs down as much as is practicable
- Understanding your business
- Providing the right level of support for the industry
- Facilitating industry debate and decision making
- Providing a valuable expertise resource

- Providing services that are relevant and appropriate to your business
- Overall helpfulness

Questions on overall improvement: We find it valuable to understand how our customers' perception of our service has varied year-on-year. We seek a view as to whether, on balance, the overall service is better or worse than it was 12 months ago. This is a helpful check on individual perceptions and mitigates a fluctuating sample population (i.e. where different individuals may participate each year). We recommend a similar question be inserted into the questionnaire.

Questions on advocacy: We also find it helpful to understand whether customers would speak well of us (or not).

Comparative Ratings: Where a respondent deals with more than two codes you have indicated that their responses will be limited to two codes. We are surprised that since one of the major benefits of a cross code survey will be to produce ratings that can be compared and contrasted, why the opportunity is not taken to seek such comparative scores from those best placed to provide them, namely individuals who have dealings with many codes. To limit the questions to two codes misses this important opportunity. A single question inviting the respondent to rank the codes of which they have experience by overall customer satisfaction would provide invaluable insight.

Questions on specific topics:

- **Accession:** We note that the survey touches on accession (Question 9). We believe that further value may be gathered by providing the opportunity for the respondent to explain why the process was difficult or easy and, perhaps, what they might suggest to improve the process.
- **Assurance:** We recognise that only certain codes (e.g. the BSC) oblige code bodies to provide services such as assurance. However, as a core component of the BSC it is important for us to receive feedback on our performance of these services. We would suggest adding a question (or questions) to rate the delivery of assurance services provided (where relevant) with an option to provide an open comment and/or a suggestion for how the service could be improved.
- **Meetings:** We believe there is value in adding an option to the 'meetings' questions to allow a respondent to provide an open comment and/or a suggestion for how meetings (or a particular category of meeting) could be improved.

Specific drafting comments

Introduction: The introduction notes:

'Previously code administrators conducted their own surveys. Ofgem now wishes to conduct a single survey across all codes to understand your experiences of dealing with you code administrator(s).'

This suggests that code bodies have agreed (or have been obliged) to de-commission their own surveys. This is not the case. As noted above (and as we indicated in our initial response to Ofgem's consultation on a proposed survey), we may determine that it is right for ELEXON to continue to commission our own, independent survey to ensure that we continue to receive customer feedback on all our services.

We would prefer the introduction to remain silent on other code administrator surveys or, alternatively, note that it will be for each code administrator to consider whether to conduct its own survey in addition to this central survey.

Code specific questions: We assume that the questions in the section 'Code Specific', 'Information and Comms - General', 'Email', 'Website', 'Meetings', 'Modifications' and 'Overall Experience' (pages 8 to 23) will be repeated for both codes (where two, rather than one code, is selected) so that it is clear which code each response relates to. We believe this to be essential in assessing performance in relation to specific codes.

If you would like to discuss any areas of our response, please contact David Jones, Head of Strategy, on 020 7380 4213, or by e-mail at david.jones@elexon.co.uk.

Yours sincerely,

Mark Bygraves
CEO, ELEXON