

**Principle**

**Code Administrators shall be critical friends**

**Documentation published by Code Administrators shall be in clear English**

**Information will be promptly and publicly available to users**

available to users

**This Code of Practice  
will be reviewed  
periodically and  
subject to  
amendment by users**

**Code Administrators  
shall support  
processes which  
enable users to access  
a 'pre-Modification'  
process to discuss and  
develop Modifications**

**A Proposer of a  
Modification will  
retain ownership of  
the detail of their  
solution**

**Code Administrators  
will facilitate  
alternative solutions  
to issues being  
developed to the  
same degree as an  
original solution**

**Estimates of  
implementation costs**

**to central systems will be produced and consulted on prior to a Modification being recommended for approval**

**Legal text will be produced and consulted upon prior to a Modification being recommended for approval**

**Modifications will be consulted upon and easily accessible to users, who will be given reasonable time to respond**

**There will be flexibility for implementation, to allow proportionate delivery time and realisation of benefits**

**The Code Administrators will report annually on**

**agreed metrics**

**Code Administrators  
will ensure cross Code  
coordination to  
progress changes  
efficiently where  
modifications impact  
multiple Codes**

**Code Administrators  
shall support  
prospective energy  
innovators**

## CACoP Principles Self Audit

### Deliverables of the principle

Helping users effectively frame and develop Modifications

Proactively reviewing and commenting on draft Modifications.

Ensuring people are available to discuss issues and Modifications with all interested parties.

Providing easily accessible education its Code Modification process.

Ensuring users understand the minimum requirements for Modifications to be progressed.

Ensuring that:

- unsubstantiated assumptions or assertions do not go unchallenged; all arguments for and against a Modification are adequately discussed at Workgroup and Panel level and reflected in Modification documents; and

- previous discussions or decisions that may be relevant to the Modification being considered are highlighted.

Providing input into the terms of reference set by the Panel and the Workgroup's analysis, taking into account, for example, any feedback on the quality of analysis provided in relation to previous reports or relevant views expressed by Ofgem.

Remaining impartial.

Encouraging participation in Code Modification processes.

Contacting relevant market participants/consumer representatives that have indicated they wish to be contacted when a Modification raises an issue that may impact on their group.

Contacting other Code Administrators if a Modification may affect them (directly or indirectly)

Ensuring that small market participant/consumer representatives viewpoints can be articulated and debated at Workgroup and Panel meetings, and that other Workgroup members or Panel members do not seek to stifle or prevent such debate.

Holding teleconference rather than 'face-to-face' meetings if this is more convenient for those that wish to participate, including smaller market participants.

Scheduling meetings that enable market participants to obtain updates on all relevant Code Modifications at one meeting.

Raising Modification issues that are relevant to small market participants who are not otherwise represented at appropriate industry meetings.

Improving websites, potentially with the inclusion of web-based forums, to provide easy access to information on Code Modifications.

Ensuring that, if known, the views of small market participants/consumer representatives are effectively articulated in Workgroup and Code Modification reports, and the impacts on small market participants/consumers are specifically described.

Responding quickly to requests for information and support.

It will be clear what the purpose of the document is (i.e. for information, for consultation)

All Modification documents will contain a high level, plain English summary.

Technical language and use of too many acronyms will be avoided, unless their use is appropriate, with a supporting glossary being provided when appropriate.

Codes will use a consistent structure for Modification related documents, with consistent templates and contents.

Code Administrators will be transparent in their processes and services.

Code Administrators will make all non-confidential information available.

Information will be available through various common communication channels, including:

Public Websites, email and regular industry forums

Code Administrators will contact relevant industry trade organisations and other Code Administrators if they are likely to be impacted by a Modification.

Websites will have good navigation.

Code Administrator contact information will be readily available.
Information will be published in a timely manner.
Meeting dates for Code Modification Workgroups and other meetings will be notified to users well in advance and meetings will be held a reasonable period of time after the Panel has agreed to the Workgroup Terms of Reference
Code Administrators who have adopted this Code of Practice shall meet from time to time to discuss how the principles in this Code of Practice are being achieved, the results of the reporting against the metrics outlined in Principle 12, and to share best practice.
Any Code Administrator or user can suggest an amendment to this Code of Practice, and suggested amendments will be discussed at the next meeting of the relevant group.
Any amendments to the Code of Practice will be consulted upon with all Code Administrators and users.
Be accessible to all through use of open forums.
Be arranged sufficiently regularly to respond to user needs.
Be planned to avoid conflicts, supported by website diaries.
Ensure notices, agendas, papers, presentations and minutes of these meetings will be placed on the Code Administrator's website as early as practicable.
Be actively supported through Code Administrators facilitating and advising users on issues.
Encourage industry input to providing solutions and advising on how resolution can be achieved and delivered.
Provide equal opportunity to interested parties to apply for Modification Workgroup membership where practically possible.
Only a Proposer can amend their Modification; where an element of the solution is silent, only the Proposer will be permitted to amend the solution to improve its clarity.
Workgroups will assist the Proposer in designing and assessing their solution, advising on any issues, but not changing the solution unless the Proposer agrees.
Workgroups will ensure that the original solution is fully developed but may also develop alternative 'solutions', which may then be progressed in accordance with Principle 7.
The Proposer will have the right to withdraw their Modification before the Code Panel has made a recommendation or decision on whether the Modification should be implemented.
Before it is consulted on, the Proposer will have the right to discuss the legal text of a Modification with those producing the text.
Any user, who has the right to a Modification, has the right to adopt a Modification that has been withdrawn by the original Proposer (in this instance the 'owner' rights are transferred in full).
Other than the Modification itself, Code Administrators will manage the process and documentation on behalf of the industry once a Modification has been raised, ensuring that all views are captured and there is consistency of approach to reporting
Other than the Proposer of the Modification, any user who has the right to raise a Modification will be allowed to propose an alternative solution.
Alternative proposals shall be raised prior to or during the Workgroup stage.
Subject to timing and ownership, there shall be no restriction on the number of alternative proposals that can be raised. Each alternative solution will be assessed with the same rigour as the proposed solution
The Code Administrators will seek to ensure cost information is produced in time to be issued for consultation.
Code Panels can agree that cost information may not be produced in certain circumstances.

Code Administrators will seek to ensure that cost information is produced in a consistent style
Users will be encouraged to provide an indication of their own costs of implementing the proposal, albeit this may be directly to Ofgem in the case of commercially sensitive information.
Lessons learnt will be captured and shared where actual costs prove to be significantly different (either higher or lower) to the estimates.
The Code Administrators will seek to ensure that legal text is produced in time to be issued for consultation.
The Code Administrators will seek to ensure legal text is produced in time for Panel consideration of Fast Track Self-Governance Modifications.
Code Panels may, by exception, agree that legal text may not be produced in certain circumstances, including where the Proposer has produced suggested text as part of the Modification.
Code Panels can agree to minor corrections to legal text at the time of making its final recommendation.
If the Panel determines that the changes to the legal text are appropriate, but considers that they cannot reasonably be considered to be minor, it may instruct the Code Administrator to carry out a further consultation on that revised text.
Code Administrators will seek to ensure that legal text is produced in a consistent style and that the legal text accurately implements the interest of the Modification.
The consultation time set by Code Panels will take account of the complexity of the issue being considered, the timetable for the Modification, and the potential impact on user resource from other cross industry business but, in absence of any other considerations, a standard 15 business day period will apply.
All views on the consultation will be captured and reflected in any discussions and reporting.
Consultations will be open to all, not just direct Code users.
Notice of consultations will be distributed broadly using all normal communication channels.
Any urgent Modifications will include a minimum five business day consultation period (if possible).
A consultation will have a clear mechanism for responding, in particular: <ul style="list-style-type: none"> <li>o contact information for queries regarding the consultation will be provided;</li> <li>o a template response form will be available for all consultation documents; and</li> <li>o the template will contain information on how a participant can respond.</li> </ul>
Implementation approaches will form part of the Modification consultation.
Options for implementation will be provided where possible.
Code Panels will be aware of the arguments for and against allowing retrospective Modifications and be mindful of previous decisions of the relevant body responsible for making the final decision.
There will be a consent process and/or Fast Track Self-Governance process to allow for housekeeping changes to be progressed and implemented in a timely manner and without incurring unnecessary cost and administration.
There will be an urgent process to ensure that urgent changes to a Code can be progressed without undue procedural barriers. The urgent process will allow for the Authority, after taking advice from the relevant Panel, to instruct a Modification to be progressed by deviating from any part of the normal Modification process.
The Code Administrators may jointly or independently appoint a third party to undertake a customer survey.
The Code Administrators may take advice from relevant experts on the final wording to be used in any customer survey.

The results of the metrics reporting and, to the extent it is separate, any customer survey, will feed into any periodic review conducted in line with Principle 4.
seek views from Code Panels, Workgroups and market participants in order to anticipate, identify and discuss related cross code changes and their impacts.
proactively update the Code Panels regularly on relevant cross Code changes.
inform the Code Panels about any related cross Code changes when they make a decision on any modifications.
proactively inform market participants when cross Code impacts are identified and seek engagement from the relevant market participants in cross Code changes.
as required, have joint or back to back Workgroup meetings on related cross Code changes.
work together to coordinate the progression and implementation timetables of related cross Code changes
if practically possible, encourage representatives from other Codes to join the Workgroup meetings when there are cross Code impacts
if practically possible, coordinate to send a package of related cross Code changes to the Authority.
encourage Workgroups and Code Panels to not unduly delay changes due to related cross Code changes.
Refer queries from energy innovators to Ofgem who will co-ordinate the process for the applicant across all relevant codes.
Extend the critical friend approach to applicants, in particular by providing timely and accessible responses to queries (as per Principle 2).
Provide support to parties that are not formally acceded to their code, with Ofgem as a coordinating body.
Collaborate with other code administrators (as per Principle 13) to identify issues that overlap with multiple codes, for the purposes of enabling innovative trials.
Identify and facilitate any necessary changes to their Codes to support / deliver this principle
Enable applicants to trial innovations, where applicable, through time limited derogations granted by Ofgem.







