Code Administration Code of Practice

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Version History

Amendment Record		
Version	Date	Description of Changes
1.0	02/06/2010	Introduced as part of Code Governance Review
2.0	02/10/2013	Updates following the CACoP review December 2011
2.1	23/10/2013	Proposed updates following the outcomes of Code Governance Review (Phase 2); Licence requirements taking effect from 5 August 2013
2.2	12/12/2013	Updated in line with Code Administrators comments
2.3	18/12/2013	Updated in line with Code Administrators comments
3.0	20/12/2013	For Authority approval
3.1	21/11/2014	Proposed updates following the CACoP review October 2014

About This Document

As part of the energy Codes Governance Review Ofgem proposed that a Code of Practice "be established to facilitate convergence and transparency in code Modification processes and to help protect the interests of small market participants and consumers through various means including increased use of plain English in modification reports".

The Code of Practice puts forward principles for Code Administrators to follow, but also sets out principles applicable to a Code Modification process. A standard Modification process is described, including standard pro-forma code Modification documents, processes and timescales.

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1 Introduction

This Code Administration Code of Practice (CACoP) is for energy Code Administrators and users. It is also intended to encourage participation from those involved in the energy business who may not be Code users, as may be strictly defined in those Codes.

The following organisations have committed to operating their Code administration functions in accordance with the Code of Practice:

Code Administrators		
Code Administrator	Code(s)	
ElectraLink Ltd	Distribution Connection Use of System Agreement (DCUSA)Supply Point Administrator Agreement (SPAA)	
ELEXON	Balancing and Settlement Code (BSC)	
Energy Network Association	Distribution Code (DCode)	
Gemserv	 iGT Uniform Network Code (IGT UNC) Master Registration Agreement (MRA) Smart Energy Code (SEC) 	
Joint Office of Gas Transporters	Uniform Network Code (UNC)	
National Grid Electricity Transmission plc	 Connection and Use of System Code (CUSC) Grid Code System Operator – Transmission Owner Code (STC) 	

Code users and Code Administrators developed the Code of Practice based on the principals that Code Administrators and Code Modification processes will:

- promote inclusive, accessible, and effective consultation;
- be governed by processes that are transparent and easily understood;
- be administered in an impartial, objective and balanced manner;
- provide rigorous, high quality analysis of any case for modification;
- be cost effective;
- contain rules and processes that are sufficiently flexible to allow for efficient Modification management; and
- be delivered in a manner that avoids unnecessary regulatory burdens.

Section 2 'Code Administration Principles' sets out the Principles that apply to Code Administration.

Section 3 'Modification Process Principles' sets out the Principles that apply when changing the Codes and the common change ('Modification') process.

While this Code of Practice sets out the 12 high-level principles which the Code Administrators are committed to following, to the extent that they are relevant, Code Administrators must comply with the relevant Code and associated licences. Where

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inconsistencies or conflicts exist between the relevant Codes and this Code of Practice, the relevant Code shall take precedence, though it is anticipated that Licensees and other Code Parties will take reasonable steps to ensure the two are aligned.

Where the Code of Practice sets out a finer level of detail for each principle, and provides accompanying process and document templates, this should be considered as the current practice which the user must have regard to, but does not preclude alternative and innovative approaches.

CACoP Principles

- 1. Code Administrators shall be critical friends
- 2. Documentation published by Code Administrators shall be in clear English
- 3. Information will be promptly and publicly available to users
- 4. This Code of Practice will be reviewed periodically and subject to amendment by users
- 5. Code Administrators shall support processes which enable users to access a 'pre-Modification' process to discuss and develop Modifications
- 6. The Proposer of a Modification will retain ownership of the detail of their solution
- 7. Code Administrators will facilitate alternative solutions to issues being developed to the same degree as an original solution
- 8. Estimates of implementation costs to central systems will be produced and consulted upon prior to a Modification being recommended for approval
- 9. Legal text will be produced and consulted upon prior to a Modification being recommended for approval
- 10. Modifications will be consulted upon and easily accessible to users, who will be given reasonable time to respond
- 11. There will be flexibility for implementation, to allow proportionate delivery time and realisation of benefits
- 12. The Code Administrators will report annually on agreed metrics

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2 Code Administration Principles

Principle 1: Code Administrators shall be critical friends

Principle description

A 'critical friend' is a Code Administrator who provides the support with an interest in the Code Modification process, but paying particular attention to under-represented parties, small market participants and consumer representatives.

Guidance on meeting the Principle

Code Administrators should achieve this principle by:

- 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.

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- 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.

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Principle 2: Documentation published by Code Administrators shall be in clear English

Principle description

Documents produced by Code Administrators need to be understood by a broad range of users. As users will have a varied level of understanding and background to each Code, documents will be clearly written.

Guidance on meeting the Principle

To achieve clear reporting:

- 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.

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Principle 3: Information will be promptly and publicly available to users

Principle description

Information produced by Code Administrators will be easily accessible to users through a number of channels.

Guidance on meeting the Principle

Users expect that:

- 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;
 - o 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.

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Principle 4: This Code of Practice will be reviewed periodically and subject to amendment by users

Principle description

It is envisaged that this Code of Practice will be reviewed at least annually by a group specifically convened for that purpose, consisting of Code Administrators who have adopted this Code of Practice and users of those Codes.

Guidance on meeting the Principle

To achieve this principle:

- 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.

Revisions to the Code of Practice will be subject to approval of Ofgem, and revised versions will be published on its website.

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3 Modification Process Principles

Principle 5: Code Administrators shall support processes which enable users to access a 'pre-Modification' process to discuss and develop Modifications

Principle description

Code Administrators will encourage industry debate and support in shaping solutions.

Guidance on meeting the Principle

Mechanisms will:

- 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.

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Principle 6: A Proposer of a Modification will retain ownership of the detail of their solution

Principle description

To ensure that a Modification is developed in the way which the Proposer intends, the Proposer will keep control over the detail of their solution. Other individuals or Workgroups cannot amend the Modification.

Guidance on meeting the Principle

To give effect to this principle:

- 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.

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Principle 7: Code Administrators will facilitate alternative solutions to issues being developed to the same degree as an original solution

Principle description

Any process for considering a suggested Modification to a Code will allow for alternative solutions to be developed and fully assessed during the Modification lifecycle.

Guidance on meeting the Principle

To ensure this happens:

- 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.

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Principle 8: Estimates of implementation costs to central systems will be produced and consulted on prior to a Modification being recommended for approval

Principle description

To allow users to fully understand and assess the impact of a Modification, the default position will be that the cost information will always be developed in time to allow for consultation. However there will be an exception process that allows for agreement not to develop costs in order to prevent unnecessary delay and assessment costs.

Guidance on meeting the Principle

To achieve this principle:

- 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.

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Principle 9: Legal text will be produced and consulted upon prior to a Modification being recommended for approval

Principle description

To allow users to fully understand and assess the impact of a Modification, the default position will be that legal drafting will always be developed in time to be issued for consultation with the exception of Fast Track Self-Governance Modifications.

Guidance on meeting the Principle

To achieve this principle:

- 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.

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Principle 10: Modifications will be consulted upon and easily accessible to users, who will be given reasonable time to respond

Principle description

All Modifications (with the exception of Fast Track Self-Governance Modifications) will have a consultation process that allows sufficient time for users to digest the information and provide a considered response. Code Administrators will facilitate this process by ensuring users are notified of consultations as soon as reasonable practicable and have easy access to all relevant information.

Guidance on meeting the Principle

To achieve this principle:

- 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:
 - contact information for queries regarding the consultation will be provided;
 - a template response form will be available for all consultation documents;
 and
 - o the template will contain information on how a participant can respond.

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Principle 11: There will be flexibility for implementation, to allow proportionate delivery time and realisation of benefits

Principle description

Implementation of Modifications will be timely to allow the benefits of a Modification to be achieved as soon as is practical. Implementation Dates will allow sufficient time for all who are impacted, including the decision making body, to make necessary preparations.

Guidance on meeting the Principle

To achieve this principle:

- 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 process¹.

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 $^{^{1}}$ Ofgem has published criteria to determine whether or not urgency is appropriate, see $\underline{\text{www.ofgem.gov.uk}}$

Principle 12: The Code Administrators will report annually on agreed metrics

Principle description

In order to assess how effectively the Code Administrators are discharging the roles and responsibilities captured within the principles of this Code of Practice and the effectiveness of the change management process more generally, the Code Administrators will report on a series of qualitative and quantitative metrics, which will include the views of recipients of the service.

Guidance on meeting the Principle

To achieve this principle:

- 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.

The metrics that the Code Administrators will report on will include, but not be restricted to, the following:

Qualitative Metrics	
Activity	Metric
Critical Friend	Number and percentage of survey respondents who stated they were 'satisfied' or better with the assistance offered by the Code Administrator
Effective Communication	Glossary and plain English summary to be provided with reports

Quantitative Metrics		
Activity	Metric	
Quality of Assessment	Number of reports 'sent back' by the Authority	
	Number and percentage of final decisions on which the Authority's assessment:	
	i) accords with the Panel's recommendation against the Relevant/Applicable Objectives	
	ii) conflicts with the Panel's recommendation owing to wider statutory considerations	
Effective Communication	Average number of respondents to consultations	
Efficient Administration	Percentage of papers published outside of the Modification rules requirements	
	Number and percentage of reports submitted to the Authority in line with the original timetable	

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Quantitative Metrics		
Activity	Metric	
	Number of extensions to timetables requested	
	Average time between a non-urgent proposal being raised and submitted for decision	
	Average time between a proposal being submitted for decision and a decision being published	
	Average time between decision and implementation (separately identifying systems and non-system changes)	
	Number of Fast Track Self-Governance Modifications raised	
Implementation Costs	Number and percentage of reports for which implementation cost estimates were available for consultation	
	Accuracy percentage difference (whether higher or lower) between estimated and actual implementation costs	

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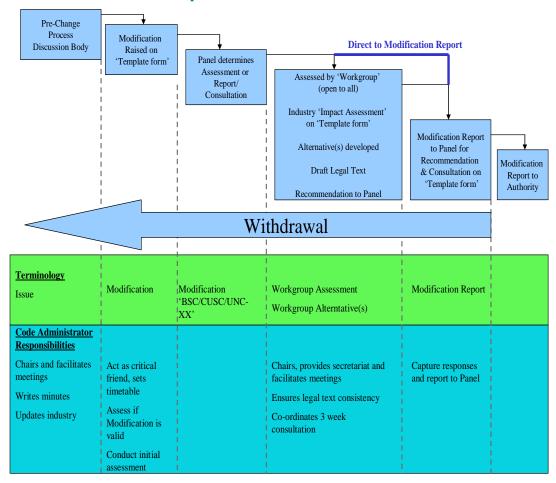
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4 Common Modification Process

Common Modification process



Pre Change process

A pre-change process will allow any interested party to raise an Issue. Code Administrators will facilitate Issues being raised and recorded, and will ensure that forums are available to be exchanged on the Issue. Industry forums will assist in framing the Issue and defining possible Modifications.

Modification raised

Parties entitled to do so may submit a proposed Modification to the Code Administrator at any time. Modifications should be submitted on the template provided and will be allocated a unique identifier. Code Administrators will give notice that a Modification has been raised, and will and will add the Modification to the next Code Panel agenda. Modifications received prior to a Panel meeting but after the agenda has been issued may be considered by the Panel at short notice.

Panel consideration

The Code Panel will decide whether a Modification should be further developed and assessed, if it is sufficiently clear and complete for the consultation process to commence, or whether it qualifies to progress as a Self-Governance or Fast Track Self-Governance Modification. The Panel may set Terms of Reference for the development and assessment of a Modification, together with a timetable. The Proposer will be entitled to attend the

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Panel meeting and set out the case for change together with their views on the appropriate process and timetable.

Industry consideration

Code Administrators will facilitate impartial industry development and assessment of all Modifications. While only the Proposer may change the Modification, the Code Administrator will be responsible for completing the reminder of the Modification Report template, ensuring that all views are captured and given equal weight.

If alternative solutions are put forward, Code Administrators will incorporate these within the template. A single document will be compiled by the Code Administrator covering the original Modification and all alternatives, although only the Proposers of both the original and each alternative will be entitled to alter their Modification.

Completed Modification documents will include the Workgroup's recommendation to the Code Panel, which will set out suggested next steps and may include an implementation recommendation.

Report to Panel

The Modification template completed by the Code Administrator will form the report to the Panel. The Panel will consider whether further development and assessment is necessary or if the Modification can be issued for consultation. The Proposer will be entitled to attend the Panel meeting and put forward views on the appropriate way forward. The Panel may also decide whether to recommend implementation of the Modification. Panels will decide the appropriate length of time for a consultation process, with 15 business days being the normal period. Panels may ask specific questions on which views would be particularly welcome.

Consultation

Code Administrators will issue Modifications for consultation as soon as possible following a Panel decision, clearly indicating the date by which views are sought, and where responses should be sent. All documents supporting the consultation will be freely available to any interested party. Code Administrators will ensure small market participants are aware of relevant consultations.

Panel recommendation

Code Administrators will update the Modification Report to reflect consultation responses. Modification Proposers will be entitled to attend and speak at Panel meetings. Panels will consider whether further assessment and development of the Modification is necessary, and may set Terms of Reference for any additional industry consideration.

If satisfied that the Modification has been sufficiently analysed and developed, the Panel will decide whether to recommend or determine that the Modification be implemented.

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Implementation

Code Administrators will record the Panel recommendation in the Modification report, and send it to the Authority (Ofgem) for decision.

As soon as reasonably practicable following an Authority decision, or the Panel's decision if Self-Governance applies, the Code Administrator will issue a notice of approval or rejection, indicating the Implementation Date if approved. Code Administrators will publish the updated Code with revised legal text.

Modification process timetable

The time taken to complete the Modification process varies. In general, it should be anticipated that a year could be needed between a Modification being raised and implemented. An indicative timetable from a Modification being raised to a decision by the Authority is:

	Process	Action	Timescale
1	Modification Raised	Code Administrator publishes Modification	One business day
2	Panel Agenda Issued	Modifications should be received at least eight business days ahead of meeting if to be included on agenda	Eight business days
3	Panel Consideration	Panel decides whether to issue Modification to consultation or if assessment and development is necessary, or to be implemented via Fast Track Self-Governance	One business day
4	Industry Assessment and Development	Debate Workgroups. Development of business rules. Consideration of legal text	Three to six months
5	Panel Consideration	Panel decides whether to issue Modification to consultation or if further assessment and development is necessary	One business day
6	Industry Consultation	Code Administrator issues Modification Report and invites views	Fifteen business days
7	Panel Recommendation	Panel considers Modification in light of responses received and decided whether to support implementation	One business day
8	Authority Decision	Ofgem decides whether or not the Modification is to be implemented	25 business days
9	Implementation	Code Administrator issues implementation notice and updates Code. Industry systems prepared for change	Less than one month if no system changes are required Several months if system changes are required

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Appendix 1: List of Code Administrators

Any party wishing to amend this Code of Practice can contact one of the Code Administrators below.

Balancing and Settlement Code (BSC) – electricity		
ELEXON Ltd		
Email	elexon.change@elexon.co.uk	
Call	020 7380 4100	
Website	www.elexon.co.uk	

Connection and Use of System Code (CUSC) – electricity		
National Grid Electricity Transmission plc		
Email	Email CUSC.team@nationalgrid.com	
Website <u>www2.nationalgrid.com/UK/Industry-information/Electricity-codes/</u>		

Distribution Code (DCode) – electricity		
Energy Network Association		
Email	david.spillet@energynetworks.org	
Call	020 7706 5124	
Website	www.dcode.org.uk	

Distribution Connection Use of System Agreement (DCUSA) – electricity		
Electralink		
Email	dcusa@electralink.co.uk	
Call	020 7432 3017 (Michael Walls)	
Website	www.dcusa.co.uk	

Grid Code – electricity	
National Grid Electricity Transmission plc	
Email	grid.code@nationalgrid.com
Website www2.nationalgrid.com/UK/Industry-information/Electricity-codes/	

iGT Uniform Network Code (iGT UNC) – gas		
Gemserv Ltd		
Email	iGTUNC@gemserv.com	
Call	020 7090 1044 (Modification Contact – Paul Rocke (iGT UNC Rep))	
Website	www.igt-unc.co.uk	

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Master Registration Agreement (MRA) – electricity	
Gemserv Ltd	
Email	helpdesk@gemserv.com
Call	020 7090 1029
Website	www.MRASCO.com

Smart Energy Code (SEC) – electricity & gas	
Gemserv Ltd	
Email	SECAS@gemserv.com
Call	020 7090 7755 (SECAS Helpdesk)
Website	www.smartenergycodecompany.co.uk

Supply Point Administration Agreement (SPAA) – gas		
ElectraLink		
Email	spaa@electraLink.co.uk	
Call	020 7432 3005 (Karin Johnson)	
Website	www.SPAA.co.uk	

System Operator – Transmission Owner Code (STC) – electricity		
National Grid Electricity Transmission plc		
Email	STCTeam@nationalgrid.com	
Website	www2.nationalgrid.com/UK/Industry-information/Electricity-codes/	

Uniform Network Code (UNC) – gas	
Joint Office of Gas Transporters	
Email	enquiries@gasgovernance.co.uk
Call	0121 288 2107
Website	www.gasgovernance.co.uk

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Appendix 2: Modification Templates

Please contact the relevant Code Administrator for more information on Modification Templates.

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Appendix 3: Glossary & References

Acronyms

Acronyms used in this document are listed in the table below.

Glossary of Defined Terms		
Acronym	Definition	
BSC	Balancing and Settlement Code	
CACoP	Code Administrator Code of Practice	
CUSC	Connection and Use of System Code	
DCode	Distribution Code	
DCUSA	Distribution Connection Use of System Agreement	
iGT UNC	iGT Uniform Network Code	
MRA	Master Registration Agreement	
SEC	Smart Energy Code	
SPAA	Supply Point Administration Agreement	
STC	System Operator – Transmission Owner Code	
UNC	Uniform Network Code	

External links

A summary of all hyperlinks used in this document are listed in the table below.

All external documents and URL links listed are correct as of the date of this document.

External Links		
Page(s)	Description	URL
15	Ofgem website	https://www.ofgem.gov.uk/
21	ELEXON website	http://www.elexon.co.uk/
21, 22	National Grid Electricity Codes website	http://www2.nationalgrid.com/UK/Indus try-information/Electricity-codes/
21	Distribution Code website	http://www.dcode.org.uk/
21	DCUSA website	http://www.dcusa.co.uk/
21	iGT Uniform Network Code website	http://www.igt-unc.co.uk/
22	Master Registration Agreement website	http://www.mrasco.com/
22	Smart Energy Code website	www.smartenergycodecompany.co.uk
22	Supply Point Administration Agreement website	http://www.spaa.co.uk/
22	Joint Office of Gas Transporters website	http://www.gasgovernance.co.uk/

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