CP Assessment Report

CP1517 'Changes to BSC Configurable Items for the TERRE Final Implementation Date'

Committee

Imbalance Settlement Group (ISG)

Recommendation

Approve

Implementation Date

P344 Final Implementation Date Notice (Ad hoc BSC Release)

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About This Document

This document is the Change Proposal (CP) Assessment Report for CP1517, which ELEXON will present to the Imbalance Settlement Group (ISG) on 20 August 2019 for decision. The ISG will consider the proposed solution and the responses received to both CP Consultations before making a decision on whether to approve CP1517.

There are 15 parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, and proposed implementation approach.
- Attachments A contains the CP1517 Proposal Form.
- B-L contain the proposed redlined changes to deliver the CP1517 solution.
- Attachment M contains the consolidated responses to the second CP1517 consultation.
- Attachment N contains the consolidated responses to the first CP1517 consultation.

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1 Why Change?

What is the issue?

There are 18 (7 Category 1 and 11 Category 2) Balancing and Settlement Code (BSC) Configurable Items (CIs) which need to be amended to give full effect to the P344 'Project TERRE implementation into GB market arrangements' solution that could not be developed in time to become effective on 28 February 2019, or which should only become effective on the P344 Final Implementation Date Notice. This is because the changes relate to the new and amended software or the new BSC Services that will be introduced upon the P344 Final Implementation Date Notice.

What is P344 'Project TERRE'

P344 'Project TERRE' aims to establish a pan-European market for Balancing Energy. The project seeks to design and develop a central platform to facilitate the close to real-time exchange of Replacement Reserves (balancing energy products) between Transmission System Operators (TSOs) in participating EU Member States.

Background

P344 'Project TERRE' Background

The changes to BSC Section H2.5 'General' for Approved Modification P344 'Project TERRE implementation into GB market arrangements'' sets out two Implementation Dates:

- The P344 Relevant Implementation Date, which was 28 February 2019 as part of the February 2019 Release; and
- The P344 Final Implementation Date, defined as the date to be specified by the National Electricity Transmission System Operator (NETSO) in the P344 Final Implementation Date Notice.

On the Relevant Implementation Date P344 was implemented into the BSC. A suite of CIs, where the solution was known, were also implemented on this date to deliver the intent of P344. However, most of the CI changes related to the P344 BSC Central System changes were not implemented on the Relevant Implementation Date as the system design work had not been completed, and was not scheduled to be completed by this date.

CP1517 progression history

On the 10 May 2019, ELEXON notified SVG and ISG members (via email) that CP1517 would be issued straight to consultation, in order that Market Participants would have visibility at the earliest opportunity of the changes proposed. This was important to enable them to accurately develop systems functionality.

Whilst CP1517 was published for industry consultation, ELEXON continued to review documentation for P344 'Project TERRE'. As a result of this work, further changes were required to the CP1517 redlining, some of which could have been material in enabling Market Participants to accurately develop system functionality as outlined below:

- The IDD Part 1 document consulted as part of the first consultation stated that the structures of the new P344 related P-flows (P0282 – P0285 and P0287 – P0288) were included in the IDD part 1 spreadsheet. However, these were erroneously omitted from the spreadsheet; and
- The MSID Pair ID data item in the SVA Data Catalogue Part 2 was stated as eight characters when it should have been 18 characters long.

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Because the comments above required material amendments to some of the CIs amended for CP1517, we presented an Interim CP1517 Assessment Report to the SVG on 2 July 2019, recommending that CP1517 be submitted for a second CP consultation. The SVG noted the recommendations of the paper and provided no comments or additional questions for inclusion for a second consultation.

Due to the timing of the next CPC batch, in accordance with the CPC timetable, and the importance of providing market participants the earliest visibility of the updates made to the IDD Spreadsheets, ISG members were asked (via email) if they disagreed that material amendments had been made, requiring CP1517 to be submitted for a second CP consultation. The ISG noted the updates regarding CP1517, so CP1517 was issued for a second consultation on the 8 July with responses due by the 2 August.

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2 Solution

Proposed solution

CP1517 seeks to amend the CIs below to give full effect to the TERRE solution that could not be developed in time to become effective on 28 February 2019, or which should only become effective on the TERRE Final Implementation Date, as notified by the P344 Final Implementation Date Notice.

The proposed solution will:

BSCP01 'Overview of Trading Arrangements':

- amend BSCP01 to include TERRE processes in the overview of Trading Arrangements;

BSCP18 'Corrections to Bid-Offer Acceptance Related Data':

- amend BSCP18 to include the process for Corrections to TERRE Acceptances;

Central Volume Allocation (CVA) Data Catalogue:

- amend to include the relevant changes to New Electricity Trading Arrangements (NETA) Interface Definition Document (IDD) Part 1;

Supplier Volume Allocation (SVA) Data Catalogue:

- amend to include the P0291 data flow 'Daily Activations Report;

Reporting Catalogue:

- amend to capture the relevant changes to Section V for TERRE;

New Electricity Trading Arrangements (NETA) Interface Definition Document (IDD) Part 1 and Spreadsheet:

- Amend the NETA IDD Part 1 Document and Spreadsheet to show:
    - the structure of the amended SAA-I014, sub-flow 1, Settlement Report for BSC Parties;
    - the structure of the new sub-flow 4 of the SAA-I014, Settlement Report for Virtual Lead Parties;
    - the amended data sent to BSC systems by the NETSO; and
    - the new and amended Valid Sets, Flow Roles, Groups and Data Items used by the new and amended data flows in both the NETA IDD Part 1 Spreadsheet and the NETA IDD Part 2 Spreadsheet;

New Electricity Trading Arrangements (NETA) Interface Definition Document (IDD) Part 2 and Spreadsheet:

- Amend the NETA IDD Part 2 Document and Spreadsheet to show:
    - the new structure of the SAA-I014, sub-flow 2, Settlement Report received by the NETSO and BSCCo;
    - the new "Stage 2" data flows;
    - the new "Internal" data flows; and

What are Category 1 Configurable Items?

Category 1 documents are defined in BSCP40 and can only be changed by a Change Proposal or a Modification. These documents include Balancing and Settlement Code Procedures (BSCPs) and Business Definition Documents (encompassing Data Catalogues, the Reporting Catalogue, the Communication Requirements Document) (BDDs).

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- the new Data Items used by the amended data flows in the NETA IDD Part 2 Spreadsheet.

Amendments to redlining following consultation

Further changes, as outlined in section 6 of this Assessment Report, have been made to the solution following the first and second CP1517 consultation. Whilst these changes are described below, you can find the detail of each amendment in section 6.

Amendments following the first consultation

Whilst CP1517 was published for the first industry consultation, ELEXON continued to review documentation for P344 'Project TERRE'. As a result of this work, further changes to the CP1517 redlining were made, some of which were considered to be material in enabling Market Participants to accurately develop system functionality as outlined below:

- The IDD Part 1 document previously consulted on stated that the structures of the new P344 related P-flows (P0282 – P0285 and P0287 – P0288) were included in the IDD part 1 spreadsheet. However, these were erroneously omitted from the spreadsheet; and
- The MSID Pair ID data item in the SVA Data Catalogue Part 2 was stated as eight characters when it should have been 18 characters long.

Amendments following the second consultation

In response to the feedback we received through the CP1517 second consultation, we have amended the redlining for NETA IDD Part 1 Document as follows:

- Correction to the structure of certain Tibco messages in Section 4.13; and
- Removal of an incorrect reference to the P344 in 'BM Unit Period Bid-Offer Acceptance (for post P305 Settlement Dates)' and add a new section 'BM Unit Period Bid-Offer Acceptance (for Effective Dates after the TERRE P344 Final Implementation Date)' in the SAA-I014.

In addition, ELEXON has made two further changes to the IDD spreadsheets (Part 1 and 2), which are a result of our continuous analysis of the CP1517 solution and engagement with our service provider. These changes are correcting errors in the dataflow. Without these changes Market Participants will need to make some assumptions in order to develop their systems, which could lead to a misalignment between their systems and BSC Systems. As such the changes are to:

- NETA IDD Part 1 Spreadsheet: to correct an error in the SQH group in the SAA-I014, sub-flows 1 and 4; and
- NETA IDD Part 2 Spreadsheet: the format of three data items in the SAA-I052 sent by SVAA has been changed from Boolean (i.e. the valid set was 'T' and 'F'), to Text (5) (where the valid set is 'True' and 'False') to enable SAA to load the SAA-I052.

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Service Descriptions and User Requirements Specifications

- The proposed solution will also amend all impacted Service Descriptions and User Requirements Specifications (outlined below in section 3) to reflect the revised service requirements and functionality for P344 'Project TERRE'. As these are Category 2 CIs, these changes will be taken through the industry review and Panel Committee approval process if the CP is approved, as part of the implementation phase.

Proposer's rationale

CP1517 is required to ensure that the remaining BSC CIs to deliver the intent of the P344 solution are implemented on the P344 Final Implementation Date Notice.

Proposed redlining

Attachments B-L contain the proposed redlined changes for CP1517.

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3 Impacts and Costs

Central impacts and costs

Central impacts

CP1517 will require document only changes to lists of impacted Category 1 and Category 2 BSC Configurable Items detailed in this Section 3, with no BSC Central System changes required. All the related software changes are being delivered under P344 Project TERRE. The intent of CP1517 is to ensure that BSC documentation is consistent with the intent and software delivered for Project TERRE.

Central Impacts	
Document Impacts	System Impacts
The impacted Category 1 BSC Configurable Items are: • BSCP01 • BSCP18 • NETA IDD Part 1 Document and Spreadsheet • NETA IDD Part 2 Document and Spreadsheet • CVA Data Catalogue • SVA Data Catalogue • Reporting Catalogue The impacted Category 2 BSC Configurable Items are: • BMRA Service Description • BSC AUDIT Service Description • ECVAA Service Description • FAA Service Description • SAA Service Description • SVAA Service Description • BMRA User Requirements Specification • ECVAA User Requirements Specification • FAA User Requirements Specification • SAA User Requirements Specification • SVAA User Requirements Specification	• Delivered as part of the P344 system changes

Central costs

The central implementation costs for CP1517 will be approximately £2280 (9.5 ELEXON Working Days to implement the document changes to give full effect to this CP).

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BSC Party & Party Agent impacts and costs

Participant impacts

Market Participant impacts, as consulted on through both CP1517 consultations, are outlined in the table below.

Impacts reported from consultations

A software supplier to BSC Parties stated in both the CP1517 consultations they would be impacted by CP1517. They will be updating the product and services supplied to BSC Parties, in particular the interfaces with the SAA and BMRA. The respondent did not disclose whether they will incur any cost as a result of the change proposed under CP1517 (or provide a magnitude of the costs); as they feel any cost impact is a commercial matter between them and BSC Parties implicated.

BSC Party & Party Agent High-Level Impacts	
BSC Party/Party Agent	Impact
The NETSO	Receiving new SAA-I014
Virtual Lead Parties	Receiving SAA-I014; submitting and receiving new TERRE flows
Suppliers	Receiving new TERRE flows

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4 Implementation Approach

Recommended Implementation Date

The implementation Date for these TERRE-related CIs should align to the go-live date for the TERRE product, in order that the BSC Central System documentation aligns to the operational functionality of BSC Central Systems.

Therefore, we recommend that CP1517 is implemented at the time of the P344 final Implementation Date Notice as defined in BSC Section H 'General'.

All the respondents to both CP1517 consultations agreed with the proposed Implementation Date.

Impacts of National Grid ESO's TERRE Derogation Request on CP1517

As outlined above, CP1517 will implement documentation required for go-live of P344 'Project TERRE' functionality. This P344 functionality is also required to facilitate wider market access to the Balancing Mechanism (BM), which we intend to go-live with in December 2019, irrespective of the outcome of National Grid ESO's derogation request to Ofgem to delay its participation in the Project TERRE balancing product to no later than December 2020. Therefore, we are still working to implement CP1517 to enable wider access to the BM in December 2019.

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5 Initial Committee Views

CP1517 was issued straight to industry consultation, for reasons outlined in section 1. An interim Assessment Report was presented to the SVG on 2 July 2019, recommending that CP1517 be submitted for a second CP consultation, due to material amendments being required to the solution. Upon ELEXON's recommendation, the SVG noted that material amendments were required to the SVA Data Catalogue and the IDD Spreadsheets to deliver the CP1517 solution and that CP1517 should be issued for a second consultation. The SVG also:

- **NOTED** the updated progression timetable for CP1517;
- **NOTED** an update will be provided to the ISG; and
- **NOTED** following second consultation, CP1517 will be presented to the ISG on the 20 August 19 and SVG on 3 September 19 for decision.

As detailed in section 1 of this paper, the ISG didn't raise any objection with the determination of the SVG and noted the update regarding CP1517.

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6 Industry Views

Industry Views on CP1517 – First Consultation

CP1517 was first issued for consultation on 17 May 2019, with a response deadline of 13 June 2019. This section summarises the responses received to the first CP1517 consultation. You can find the full responses in Attachment N.

Summary of CP1517 First Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1517 proposed solution?	2	0	0	0
Do you agree that the draft redlining delivers the intent of CP1517?	1	1	0	0
Will CP1517 impact your organisation?	1	1	0	0
Will your organisation incur any costs in implementing CP1517?	0	1	0	1
Do you agree with the proposed implementation approach for CP1517?	2	0	0	0
Do you have any further comments on CP1517?	0	2	0	0

Comments on the proposed redlining

In response to the feedback we received through the first CP1517 consultation, we amended the redlining for NETA IDD Part 1 Document, and BSCP01. The amendments have addressed inconsistencies referred to in the first consultation, as well as clarifications.

The table below summarises the specific comments from Market Participants on the CP1517 redlining, as well as ELEXON's response.

Comments on the CP1517 Proposed Redlining			
Document	Location	Market Participant Comment	ELEXON's Response
NETA IDD Part 1 Document	3.1.1	Does this need another bullet point for Replacement Reserve Data?	Added another bullet for RR to this section
	3.1.1 table	Should not BMRA-I037 be included?	Added BMRA-I037
	4.12.4.162	Data item 'QP' indicated as being in message type 'PRRC' but is not included in the message definition at 4.12.5.73. The message is a period	Agreed, removed PRRC from this section

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Comments on the CP1517 Proposed Redlining			
Document	Location	Market Participant Comment	ELEXON's Response
		level message and should not need 'QP'.	
	4.12.4.187	RR Instruction Flag 'RN' shown as being in BOALF message but the message definition for BOALF does not include the 'RN' field.	Corrected BOALF message at 4.12.5.27 to include RR Instruction Flag
	4.12.4.188	RR Schedule Flag 'SC' shown as being in BOALF message but the message definition for BOALF does not include the 'SC' field.	Corrected BOALF message at 4.12.5.27 to include RR Schedule Flag
	4.12.5.34	Should not the DISEBSP message contain data items related to the aggregate RR volumes used in the system price calculation?	Message will contain TERRE-related data but format is unchanged; there are no additional RR-specific volumes reported in this flow
	4.12.5.58	Should not the ISPSTACK message contain data items related to the aggregate RR volumes used in the system price calculation?	Message will contain TERRE-related data but format is unchanged. In this case, in the ISPSTACK message, RR sell and buy actions will be listed in the appropriate stacks with an ID of 'RRAUSS' and 'RRAUSB' respectively. The Volume of GB Need Met for each Quarter Hour Period will also be listed in the stacks with Ids of 'Q1' and Q2'.Modified section 4.3.1 to clarify further.
	4.12.5.69	Typo: 'EM' in place of 'EB' for Exclusive Bid.	Corrected
	4.12.5.75	Typo: 'GMNM' in place of 'GBNM'.	Corrected

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Comments on the CP1517 Proposed Redlining			
Document	Location	Market Participant Comment	ELEXON's Response
NETA IDD Part 1 spreadsheet	SAA_I014, row 988	BRR data group: BRR shown with cardinality of 0-1. Does this mean if there are no acceptances then BRR will not be displayed, given that each of the fields is shown as mandatory ('1')? If so, then it looks like the child data group for RR Bids ('BRR') would be omitted – but there can of course be RR Bids without acceptances.	We will report a BRR group if there is any relevant TERRE data (Bids or Activations) to report. Note that this applies to all variants of the SAA-I014 data flow. An update has been made.

Comments on the CP1517 Proposed Redlining			
Document	Location	Market Participant Comment	ELEXON's Response
BSCP01	New diagram 3.5	Doesn't include RR Instructions as distinct from RR Acceptances – is this deliberate?	Amended
	4.1 table row 16	Timescale says RR Delivered Volumes to be reported by +3 WD (1700) but BSCP 602 (2.2.1) says 'Within 1 WD of the provision of a Balancing Service.'	Amended to "+1 WD"

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Amendments to the redlining after the first CP1517 consultation

The CP1517 redlining was amended as a result of the Market Participants' comments above. Further, whilst CP1517 was published for industry consultation, ELEXON continued to review documentation for P344 'Project TERRE'. As a result of this work, further changes are required to the CP1517 redlining, some of which could be material in enabling Market Participants to accurately develop system functionality as outlined below:

- IDD Part 1 spreadsheet:
    - P0282-P0285 and P0287-P0288 flows were added to IDD Part 1 spreadsheet (as a separate tab, without N-numbers for the data items)
    - Cardinality of the RUE, RUI, RDE and RDI groups in the IDD were changed from '0-*' to '0-1' in the SAA-I014 sub flows 1 and 4.
    - RRA and RRB groups were changed to be children of the BQH group in the SAA-I014 sub flows 1 and 4.
- IDD Part 2 spreadsheet:
    - Cardinality of the RUE, RUI, RDE and RDI groups in the IDD were changed from '0-*' to '0-1' in the SAA-I014 sub flow 2.
    - RRA and RRB groups were changed to be children of the BQH group in the SAA-I014 sub flow 2.
    - Small amendment to P0290 with the introduction of a new item N0635 for Associated Supplier BM Unit Id
- IDD Part 1 word document:
    - updated to include Trading Party – Supplier ('TS') and Virtual Lead Party ('VP')
- SVA Data Catalogue Part 2:
    - The MSID Pair ID data item was updated from eight characters to 18 characters long.

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Industry Views on CP1517– Second Consultation

CP1517 was submitted for a second Consultation (as explained in Section 1) on 8 July, with responses due by 5pm, Friday 2 August. Per ELEXON's usual process, we circulated reminders for market participants to respond to the CP consultation, and also included reminders in our weekly Newscast publication. One market participant responded, who also responded to the first CP1517 consultation. The market Participant provided further views on the CP1517 draft redlining, which are presented in the table below alongside our response. The comments on the redlining provided by the market participant are not material as they are seeking clarifications.

Summary of CP1517 second Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1517 updated solution following the first CP consultation?	1	0	0	0
Do you agree that the updated draft redlining as part of this second CP1517 consultation delivers the CP1517 proposed solution?	0	1	0	0
Will CP1517 impact your organisation?	1	0	0	0
Will your organisation incur any costs in implementing CP1517?	1	0	0	0
Do you agree with the proposed implementation approach for CP1517?	1	0	0	0
Do you have any further comments on CP1517?	1	0	0	0

Comments on the proposed redlining

The table below summarises the specific comments from Market Participants on the CP1517 redlining, as well as ELEXON's response.

Comments on the CP1517 Proposed Redlining			
Document	Location	Market Participant Comment	ELEXON's Response
NETA IDD Part 1 Document	4.13.11.2 4.13.11.3 4.13.11.4 4.13.11.5	Section 4.13.11.2: Body Record Bid Acceptance Volumes Contains RR Instruction Flag Section 4.13.11.3: Body Record Offer Acceptance Volumes Does not contains RR Instruction Flag Section 4.13.11.4: Body Record Indicative Period Bid Acceptance Volumes (post P217) Does not contains RR Instruction Flag	All these downloads will contain an RR Instruction Flag; ELEXON has updated the description to match.

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Comments on the CP1517 Proposed Redlining			
Document	Location	Market Participant Comment	ELEXON's Response
		Section 4.13.11.5: Body Record Indicative Period Offer Acceptance Volumes (post P217) Does not contains RR Instruction Flag The first is different to the remainder – which is correct?	
	BM Unit Derived Data	Assuming the volume records above should contain the RR Instruction Flag, should these Cashflow records have the RR Instruction Flag as well, to keep them consistent with the volume records?	The RR Instruction Flag relates to acceptances. The cashflow records don't flag items in the same way as acceptances, and so for consistency we are not planning to introduce RR flags into these records. No change to the IDD.
	Market Depth Data	Assuming the volume records above should contain the RR Instruction Flag, should these Cashflow records have the RR Instruction Flag as well, to keep them consistent with the volume records?	We're not planning to change the existing Market Depth data set; aggregated TERRE data will be provided separately as part of the Market Data reporting area on BMRS. No change to the IDD.
	8.4 SAA-I014	Includes the text: BM Unit Period Bid-Offer Acceptance (for Effective Dates after the TERRE P344 Final Implementation Date): Acceptance STOR Provider Flag Reserve Scarcity Price Flag I don't think this should reference TERRE – did not P305 introduce these? This seems to be corroborated by the IDD spreadsheet, S0141 v9, lines 749 to 753.	This is an error on our part; ELEXON has moved the header down so it sits above the three new fields introduced for TERRE: Acceptance Time, RR Instruction Flag and RR Schedule Flag
	8.4.1 Aggregate Party Day Charges 8.4.2 Aggregate VLP Day Charges	Is correct for these data groups to include 'Total System RR Cashflow'? They are related to Party data after all, and I don't believe they include any system level BM data.	While you are correct to say that these groups don't need to include 'Total System RR Cashflow', it would introduce significant risk to TERRE delivery if we change the structure now. We will seek to correct this the next time the SAA-I014 reports are changing. No change to the IDD.

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In response to the above feedback we received through the CP1517 second consultation, we have amended the redlining for NETA IDD Part 1 Document. In addition, ELEXON has made two further changes to the IDD spreadsheets (Part 1 and 2), which are a result of our continuous analysis of the CP1517 solution and engagement with our service provider.

Document	Location	Comment	ELEXON's Rationale
IDD Part 2 *Stage 2* worksheet	Rows 134-136	The three boolean data items need to be changed to text(5). This is because boolean means 'T' or 'F', whereas SAA is populating these data items with 'TRUE' or 'FALSE'.	If this change is not made, SAA would reject the dataflow sent by SVAA.
IDD Part 1, SAA Tab	Rows 648-651 and 888-891	The data items in the SQH group need to be moved down a level (from L3 to L4).	This is correcting an error: the structure of the IDD requires that data items are always one level below the record that contains them.

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7 Recommendations

We invite you to:

- **NOTE** the amendments following the first CP1517 Consultation to the proposed redlining for:
    - BSCP01;and
    - NETA IDD Part 1 document and spreadsheet;
- **AGREE** the amendments following the second CP1517 consultation to the proposed redlining for:
    - the NETA IDD Part 1 Spreadsheet and document; and
    - the NETA IDD Part 2 Spreadsheet and document
- **APPROVE** the proposed changes Redlining for CP1517 to:
    - BSCP01;
    - BSCP18;
    - CVA Data Catalogue Annex A;
    - CVA Data Catalogue Annex B;
    - NETA IDD Part 1 document;
    - NETA IDD Part 1 spreadsheet;
    - NETA IDD Part 2 document;
    - NETA IDD Part 2 spreadsheet; and
    - Reporting Catalogue
- **APPROVE** CP1517 for implementation on the P344 Final Implementation Date Notice as set out in BSC Section H 'General'.
- **NOTE** that CP1517 will also be presented to the SVG on 3 September 2019 for decision.

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Appendix 1: Glossary & References

Acronyms

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

Acronyms	
Acronym	Definition
BMRA	Balancing Mechanism Reporting Agent
CVA	Central Volume Allocation
CIs	Configurable Items
ECVAA	Energy Contract Volume Aggregation Agent
FAA	Funds Administration Agent
IDD	Interface Definition Document
VLPs	Virtual Lead Parties
SVAA	Supplier Volume Allocation Agent
SVG	Supplier Volume Allocation Group
NETSO	National Electricity Transmission System Operator
ISG	Imbalance Settlement Group
TERRE	Trans-European Replacement Reserves Exchange

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
2	Webpage for P344 'Project TERRE'	https://www.elexon.co.uk/mod-proposal/p344/
8	BSC Section H 'General'	https://www.elexon.co.uk/the-bsc/bsc-section-h-general/
9	National Grid ESO's derogation request to Ofgem	https://gallery.mailchimp.com/653aa73e3a1af04b72fa0b5ae/files/136dab3c-9f2c-47da-97be-68a4e25b7353/21_June_2019_TERRE_GB_Update.pdf

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