ELEXON

Final CP Report

CP1555 'Provision of consumption data to Distributors for Measurement Classes G and F'

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About This Document

Not sure where to start? We suggest reading the following sections:

- Have 5 mins? Read section 1
- Have 15 mins? Read sections 1, 4, 5 and 8
- Have 30 mins? Read all sections
- Have longer? Read all sections and the annexes and attachments

This document is the CP1555 Final Change Proposal (CP) Report which Elexon has published following the final decision from the SVG to reject CP1555.

There are six parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, and implementation approach. It also summarises the SVG's views on the proposed changes and the views of respondents to the CP Consultation, along with the final decision to reject this change.
- Attachment A contains the CP proposal form.
- Attachments B-D contain(s) the proposed redlined changes to deliver the CP1555 solution.
- Attachment E contains the full responses received to the CP Consultation.

1. Summary

Why change?

The Distribution Connection and Use of System Agreement (DCUSA) has implemented new Targeted Charging Review (TCR) arrangements, and under these new arrangements Licenced Distribution System Operators (LDSOs) will require Half Hourly (HH) Metered Data for individual Metering Systems (from here on referred to as MSIDs).

The Balancing and Settlement Code Procedure (BSCP) that describes the key interfaces and timetables for sending appropriate HH metered data for Metering Systems registered in the Supplier Meter Registration Service (SMRS) is BSCP502. Currently, BSCP502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS' does not require Half Hourly Data Collectors (HHDCs) to send MSID-level HH data to LDSOs for Metering Systems in Measurement Classes (MC) F and G.

Solution

This CP proposed to update the requirements in BSCP502 to require HHDCs to send D0036 (MM00413) 'Validated Half Hourly Advances for Inclusion in Aggregated Supplier Matrix' or D0275 (MM00206) 'Validated Half Hourly Advances' for non-Data Communications Company (DCC) enrolled Metering Systems and D0380 (MM00363) 'Half Hourly Advances for Inclusion in Aggregated Supplier Matrix' for DCC enrolled Metering Systems to LDSOs.

Impacts and costs

This CP was expected to impact LDSOs and HHDCs. Initially it was expected that no significant system changes should be required by HHDCs to send the data, and that LDSOs would only need to undergo system changes should they wish to use the data. The consultation responses established that LDSOs would require significant system changes, due to impacts upon the billing systems, with cost estimates provided of £10k to £800k. Additionally, one HHDC identified impacts due to additional processing requirements.

In addition to Party and Party Agent impacts, this change would have affected BSCP502, the SVA Data Catalogue, and Energy Market Architecture Repository (EMAR). There would have been no central system changes required. Therefore the central implementation costs for this CP would be less than £1,000 to implement the relevant document changes.

Implementation

The CP was originally proposed for implementation on 24 February 2022 as part of the standard February 2022 BSC Release, in order to begin provision of the data to meet the TCR requirements before April 2022. Following the consultation, should CP1555 have been approved, the recommended Implementation Date was amended to 23 February 2023 as part of the standard February 2023 BSC Release.

Committee Decision

The SVG:

- **REJECTED** the proposed changes to BSCP502, the SVA Data Catalogue, and EMAR for CP1555;
- **REJECTED** CP1555.

Measurement Class F

Measurement Class "F" includes Half Hourly Metering Equipment at below 100kW Premises with current transformer or whole current, and at Domestic Premises.

Measurement Class G

Measurement Class "G" includes Half Hourly Metering Equipment at below 100kW Premises with whole current and not at Domestic Premises.

Market Messages

Following the implementation of the Retail Energy Code (REC), data flows are now known as market messages and have market message identifiers in EMAR. These are shown in brackets after the first mention of each Data Transfer Catalogue Dataflow (DTCD) Code, and are all listed in Appendix 1.

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2. Why Change?

What is the issue?

Under the DCUSA's new TCR arrangements, LDSOs will require HH Metered Data for individual MSIDs in MC G. Currently BSCP502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS' does not require HHDCs to send MSID-level HH data for MC F and G to LDSOs.

Background

LDSOs do not receive HH Metered Data for individual MSIDs in MC F and G. This means that, for MC G Metering Systems, LDSOs cannot accurately determine Residual Charging Bands or assign sites to the correct Residual Charging Band in accordance with DCUSA Schedule 32.

In particular LDSOs must collate 24 months' consumption data in order to establish the upper and lower threshold limits for Residual Charging Bands and to allocate certain individual non-domestic sites to these Residual Charging Bands. These sites do not have an Agreed Capacity with the LDSO and so the LDSO must use the sites' actual or expected consumption (Import) in order to assign it to a Residual Charging Band.

Presently LDSOs receive Estimated Annual Consumption (EAC) data for individual Non-Half Hourly (NHH) metered sites with Measurement Class A and B MSIDs via the P222 flow and HH Metered Data for HH metered Sites with Measurement Class C-E MSIDs via D0036 or D0275 flows. However, LDSOs do not receive Metered Data for individual MSIDs in measurement classes F and G. This is because when MC F and G were introduced, it was decided that Metered Data from these MSIDs should be aggregated with all other NHH Metered Data and reported to LDSOs in the D0030 (MM00411) 'Aggregated DUoS Report'. Consequently LDSOs do not receive individual MSID Metered Data for MC F and G MSIDs.

Targeted Charging Review

The Targeted Charging Review is an Ofgem led project that assessed how residual network charges should be set and recovered in Great Britain by LDSOs, including Distributor Network Operators (DNOs), Independent Distribution Network Operators (IDNOs), and the National Electricity Transmission System Operator (NETSO). Ofgem set up the TCR in response to the changing role of the networks as more electricity is generated from a wider range of sources and more flexible demand.

The DCUSA Change Proposal DCP361 'Ofgem Targeted Charging Review Implementation: Calculation of Charges' will be implemented on 1 April 2022, and data from this date will be required by LDSOs for banding and allocation.

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3. Solution

Proposed solution

This CP proposed to update the requirements in BSCP502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS' to require HHDCs to send D0036 or D0275 for non-DCC enrolled meters and D0380 for DCC enrolled meters to LDSOs. This would have involved amending BSCP502 sections 3.4.1.12 and 3.4.6.10, SVA Data Catalogue Volume 1: Data Interfaces Appendix A, and the EMAR.

This solution would expand on an existing process and interface for the sending of this data, so may be preferable to solutions that would require the development of a new interface, such as a new P-flow.

Proposer's rationale

In accordance with BSCP502, LDSOs only currently receive meter read details for individual MC F and G MSIDs via the market message D0010 (MM00257) 'Meter Readings'. Not all LDSOs use D0010 Meter Read data and believe it may be more costly to make system changes to use these than to use existing systems that process HH Metered Data received in D0036 and D0275.

To date, as a workaround, LDSOs have procured D0036 and D0275 data from ElectraLink on commercial terms to allow LDSOs to undertake the initial band setting and allocation. LDSOs have reported that the data procured from ElectraLink does not cover all MC G MSIDs.

Ensuring that D0036, D0275, or D0380 are sent to LDSOs for MC F and G MSIDs would ensure that LDSOs receive data for all HH MSIDs.

It should be noted that this solution intended to provide LDSOs with HH metered data for MC F and G Metering Systems but not compel them to use it.

Rejected redlining

The CP proposed to update BSCP502, the SVA Data Catalogue, and EMAR. The redlining to support this change can be found in Attachments B- D.

Alternative Solutions

As a result of the consultation responses, Elexon considered several alternate solutions and discussed these with a number of respondents. Some of these options would require a BSC change, while others fall outside the BSC. During these discussions there was no single option that garnered a clear consensus of support.

Provide only MC G HH metered data

Data for MC F is not required for Residual Charge Band setting or allocation, as this measurement class is for domestic customers. In order to reduce the volume of additional data received by LDSOs and the associated processing costs, the CP1555 solution could be amended to only supply MC G data.

There are only around 62,500 MC G MSIDs compared to potentially millions of MC F MSIDs, so reducing the scope of the change to MC G should reduce the potential impacts on systems. This would reduce data processing requirements for both LDSOs and HHDCs, but would not entirely alleviate the other issues with the CP1555 solution, such as impacts to billing systems.

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Enable optionality in the provision of only MC G HH metered data

Some LDSO respondents were particularly concerned about the costs of changing their billing systems. Development would be required due to the additional MC G data provided through D0036 or D0275 having to be separated from the MC C-E MSIDs used for HH billing. However, the market messages D0036 and D0275 both provide Half Hourly Advances, and generally LDSOs use one or the other. If LDSOs had the option to request that only certain market messages are sent to them for MC G MSIDs then changes to their billing system could be avoided or limited. For example, where an LDSO uses the D0036 for billing purposes they could request that data for MC G MSIDs are sent via D0275, so that different flows are used for different purposes. Alternatively, LDSOs may decide not to opt in to receive any HH metered data for MC G MSIDs.

However, through discussion with a billing system provider, we understand that because DNOs use a common billing system, building optionality into this system may actually increase the cost and complexity of implementation for this change proposal and for future changes too. That is, the billing system would have to cater for situations where LDSOs had opted-in to receive the data and where they had not.

It should be noted that D0036 and D0275 use different time-standards (UTC versus local) and it is understood that LDSOs may prefer to only use one or the other to avoid having to operate systems that use different time-standards for different processes.

Send data via D0379 and D0380 only

Another option to avoid changes to LDSO billing systems would be not providing data through D0036 and D0275, and using only D0380 and D0379 (MM00361) 'Half Hourly Advances UTC'.

Currently, BSCP502 and the EMAR do not require the more granular data in D0379 and D0380 to be passed to Distributors. This has recently been discussed at Unmetered Supplies User Group (UMSUG), with a desire to require the HHDC to share these market messages. However, D0379 and D0380 only cover DCC enrolled MSIDs, so would not provide full coverage of MC G MSIDs. Full provision would involve a change to require all MC G MSID HH data to be sent using D0379 or D0380, irrespective of whether these MSIDs are DCC-enrolled. This may be a more substantial industry change, requiring further consultation.

Create a new, dedicated report

Another alternative that would avoid LDSO billing system changes would be to send the data required for determining charging bands in a new dedicated report. Such a report might annually aggregate HH metered data to provide the last twelve months' aggregated consumption for each MC G MSID. This may require less resource for storage and processing than providing data through the proposed market messages.

A BSC change could be raised to define a new requirement on HHDCs, HHDAs, Elexon, or another person (e.g. a future Market-wide Half-Hourly Settlement service provider) to produce the report and send it using a new market message over the Data Transfer Network (DTN) or using a new P-flow. This approach would define a process and interface that would be governed by the BSC.

It should be noted that Market-wide Half-Hourly Settlement (MHHS) arrangements are currently being defined and are not expected to be live until 2024. MHHS arrangements would mean that all MSIDs HH metered data is held centrally and could be easily aggregated and reported to LDSOs.

There are also methods by which a dedicated report could be generated that fall outside of the BSC. This requirement to produce a report and to send it to LDSOs could be defined within the DCUSA, or the data could be provided by HHDCs as part of a bi-lateral, commercial agreement.

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As it stands, the requirements for such a report have not been defined or assessed. It is likely that whilst these options reduce the impact on LDSOs to process HH data, those responsible for generating the reports may face a greater impact their systems. These impacts would be due to the requirement to monitor, collect, store, and sum HH data for MC G metering systems, as well as the requirement to send the reports. There may be additional challenges to overcome dependant on who these requirements fall upon, for example, when Suppliers change their Party Agents the new HHDC may then not have 12 months data to send to the LDSOs.

Use of D0010

D0010 market messages provide meter readings, so multiple D0010s are required in order to calculate a meter advance, i.e. the difference between two meter readings enables the level of Import or Export to be determined. BSCP502 already requires that this market message is sent to LDSOs, so no BSC change would be required for this option to be used.

Initially, the idea for using D0010s was disregarded, as we had been lead to believe that it was not commonly used by LDSOs as they are not received reliably enough to use. Also, in some cases the meter technical details are required in order to translate the meter readings and advance into a kWh value.

However, due to the impacts resulting from the proposed CP1555 solution, four respondents indicated that the use of D0010s would be preferable. The data provided by this market message should be sufficient for LDSOs to calculate MC G MSID's annual consumption for determining charging bands. Also, whilst some system development may be required for this solution, there would be no impacts to LDSO billing systems and no system changes required for HHDCs.

Elexon is concerned that LDSOs are experiencing problems receiving D0010s and are exploring the scale and materiality with affected LDSOs to determine what can be done. However, in the context of Performance Assurance, the provision of D0010s to LDSOs is not strictly necessary for Settlement, so it is not clear how best to proceed.

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4. Impacts and Costs

BSC Party & Party Agent impacts and costs

Participant impacts

This CP was expected to positively impact LDSOs as they would be provided data that they require under the new TCR arrangements. The initial assessment was that LDSO system changes would be minor and optional - only required if the Party wished to utilise the data.

However, the consultation responses indicated that significant updates to LDSOs' systems may be required to process additional data via D0036, D0275, and D0380 market messages. In particular, LDSOs' systems, including hardware, may need upgrading to process larger volumes of data and development may be necessary to filter out data flows used for billing purposes from those that are used for charge band setting. As these market messages do not contain MC identifiers, systems would need an interface with registration systems and business rules to filter out the MC F and G data.

The CP would also have impacted upon HHDCs, as they would be required to send additional data. As this change would simply add further recipients into an established process, the impact was anticipated to be minimal. Consultation responses have, to some extent, confirmed this but have also indicated that the required development and additional processing could impact work being undertaken for other BSC changes and enduring operational processes.

Electralink did not provide a formal consultation response, but were approached to comment on the change. Whilst this change would have increased the volume of data being transferred over the Data Transfer Network (DTN), Electralink have confirmed that the systems can scale to handle increases in data flows from a transfer and storage perspective and so did not anticipate any issues caused by this change.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	**Impact**
LDSOs	System changes, increased processing requirements
HHDCs	Additional recipients for Metered Data, increased processing requirements

Participant costs

Respondents to the CP1555 consultation provided several different cost estimates. The estimated costs for an LDSO ranged from £10-15k for the system changes, through to an estimate of £800k over the first 5 years, for development, implementation, and maintenance of the solution. We understand that this wide range in costs is because different market participants' systems rely on different configurations of software and hardware. Consequently, even a modest change may require more material changes to handle an increase in processing and storage requirements, and/or to schedule the change alongside a number of other competing priorities.

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Central impacts and costs

Central impacts

This CP would have required changes to BSCP502, the SVA Data Catalogue, and EMAR. No central system changes or impact on BSC Agents were anticipated.

Central Impacts	
Document Impacts	**System Impacts**
• BSCP502 ‘Half Hourly Data Collection for SVA Metering Systems Registered in SMRS’ • The SVA Data Catalogue Volume 1	• None

Central costs

The central implementation costs for CP1555 would have been less than £1,000 to implement the relevant document changes.

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5. Implementation Approach

Rejected Implementation Date

The CP was originally proposed for implementation on 24 February 2022 as part of the standard February 2022 BSC Release, in order to begin provision of the data to meet the TCR requirements before April 2022. However, during the consultation the implementation date rationale was questioned, as under DCUSA Schedule 32 para 4.2. (a)(iii), LDSOs have provision to set charging bands based on “other available information that is appropriate for a typical profile of a similar site to best estimate the expected annual import consumption of the Final Demand Site”. This provision would allow LDSOs to fulfil the TCR obligations without this CP, meaning there is no urgency to implement CP1555 prior to April 2022.

The majority of consultation respondents stated that significant time for development and testing would be required, with some suggesting that other development commitments would impact on their ability to implement CP1555. Therefore, should CP1555 have been approved, the recommended Implementation Date was amended to 23 February 2023 as part of the standard February 2023 BSC Release.

Following the consultation, both Elexon and the proposer recommended that the CP should be rejected and therefore should not be included in any upcoming BSC Releases.

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6. Initial Committee Views

SVG's initial views

The CP1555 Progression Paper was presented to the SVG at their meeting on November 2 2021, SVG249.

Originally when CP1555 was presented to the SVG, the references to the market messages used the new market messages Identifiers (e.g. MM00413) rather than the Data Transfer Catalogue Dataflow (DTCD) Codes (e.g. D0036). An SVG member questioned whether references to the new market message identifiers would be confusing, as there is currently no mapping for how these relate to the DTCD Codes. The SVG members therefore suggested that the DTCD Codes be referenced during the reporting for this CP. As the BSC refers to the DTCD codes, Elexon agreed.

Further work to align the BSC with the Retail Energy Code (REC) will be considered separately to this CP.

The SVG had no further comments on the Change Proposal.

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7. Industry Views

This section summarises the responses received to the CP Consultation. Eleven responses were received - five from Distributors, five from HHDCs, and one from a Meter Administrator. You can find the full responses in Attachment E.

Summary of CP1555 CP Consultation Responses

Question	Yes	No	Neutral/No Comment	Other
Do you agree with the CP1555 proposed solution?	6	5	0	0
Do you agree that the draft redlining delivers the intent of CP1555?	6	3	1	1
Will CP1555 impact your organisation?	10	1	0	0
Will your organisation incur any costs in implementing CP1555?	9	1	1	0
Do you agree with the proposed implementation approach for CP1555?	3	8	0	0
Do you have any further comments on CP1555?	1	0	10	0

Proposed Solution

While six respondents agreed with the overall change, particularly its intent to provide a consistent and complete view of MC G MSIDs metered data, only three agreed without questions or concern. Six respondents indicated that the impacts of CP1555 as proposed could not be justified. The reasons for not agreeing with the proposed solution include:

- Significant impacts and costs are expected from the proposed solution, as summarised in Section 4 and in the following section;
- Receiving the HH metered data on a daily basis is not required, and the volume of data has a significant effect upon he magnitude of the impacts and costs;
    - TCR charging bands must be initially determined and are then only reviewed periodically – processing and storing a significant volume of data for an infrequent process is an inefficient use of resources;
    - Estimated Annual Consumption data is used for determining charging bands for Non-Half Hourly (NHH) sites with Measurement Class A and B MSIDs, meaning that annualised data could be used for MC G MSIDs;
- The CP1555 solution would only be a temporary solution until the implementation of Market-wide Half-Hourly Settlement (MHHS); and
- There have been data quality issues with the market messages proposed in CP1555, with data often missing, and it is suspected that increasing the volume of data will exacerbate the problem.

Several alternate solutions were identified in responses and discussed in follow-up conversations with some respondents. These have been summarised in Section 3.

Based on responses and follow-up conversations there was a view that whilst existing processes and data may not be perfect they may be sufficient to allow LDSOs to find their own solutions, certainly until a centralised MHHS solution may become available.

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Impacts and Costs

The following summarises respondents' views and is in addition to our summary of impacts in Section 3.

LDSOs already use D0036 and D0275 market messages to carry out existing network charging and other operational processes. Consultation responses and subsequent discussions with the respondents have identified that there may be material changes to systems and processes to accommodate the additional HH metered data for MC F and G MSIDs. For example, to filter out messages used for billing from messages which would only be used for Charge Band setting. These changes may require new interfaces between systems as no Measurement Class or Line Loss Factor Class information is included within the market messages proposed by CP1555.

There were also concerns about the volume of data that would need to be stored, processed, and validated, and the impact this would have upon system resources from both LDSOs and HHDCs. It is possible that these impacts, alongside the cumulative impacts of other changes, would result in processing delays to other processes or require significant investment.

Implementation Approach

The Implementation Date rationale was questioned, as under DCUSA Schedule 32 para 4.2. (a)(iii), LDSOs have provision to set charging bands based on "other available information that is appropriate for a typical profile of a similar site to best estimate the expected annual import consumption of the Final Demand Site". This provision would allow LDSOs to fulfil the TCR obligations without this CP, meaning there is no urgency to implement CP1555 prior to April 2022.

Additionally, due to the system impacts identified during the consultation, the majority of respondents stated that time would be required for system development and testing prior to implementation. This is especially necessary where resources have already been committed to development for other BSC changes. Due to other development commitments, it would be difficult for some companies to progress this change within the next 12 months.

Comments on the proposed redlining

Comments received relating to the proposed redlining and Elexon's response are shown in the table below. Responses that were questioning the approach, rather than assessing the accuracy proposed redlining, have not been included here but can be found with the full responses in Attachment E.

Comments on the CP1555 Proposed Redlining		
Document & Location	**Comment**	**Elexon's Response**
D0380 Title	The title of the message is incorrect	This has been corrected
D0380 Group 64L	The Validation Flag must not be included for the HHDC to Distributor roles	This has been corrected

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8. Final Committee Views and Decision

Elexon's final views

It is clear from Elexon's work to help develop this Change Proposal with the Proposer and LDSOs, and from responses to the CP1555 consultation that there are a range of views on how LDSOs may satisfy their TCR requirements. This is demonstrated by the number of alternative solutions that have been considered, as discussed in Section 3. Furthermore, initial views underestimated the potential impacts to LDSOs and Party Agents' systems.

Ultimately we believe that the implementation of MHHS may deliver the systems and arrangements for providing a neat, centralised solution. However, any such solution is dependent on the implementation of the overall MHHS arrangements, which are not expected until at least 2024.

In the meantime we believe that further work with LDSOs, Party Agents and other affected parties would be required to properly examine the costs and benefits of different options to see if a consensus on how to proceed could be agreed. Without this additional work we do not believe that a strong case for implementing CP1555 or a variation of CP1555, such as providing only data for MC G, has been made.

Based on the responses and follow-up conversations there is a view that whilst existing processes and data may not be perfect, they may be sufficient until a centralised MHHS solution becomes available. Additionally bi-lateral agreements between LDSOs and HHDCs and/or Electralink could be arranged to provide this data without the need for code change. Should further work be required, Elexon would be happy to participate but, seeing as the underlying requirement exists to support the calculation of distribution network charges, it may be appropriate to consider whether existing DCUSA governance can find a solution.

SVG's final views

The Assessment Report for CP1555 was presented to SVG at its meeting on 1 February 2022, SVG252. The committee agreed with Elexon's views and unanimously agreed to reject CP1555.

Final decision

The SVG:

- **REJECTED** the proposed changes to BSCP502, the SVA Data Catalogue, and EMAR for CP1555;
- **REJECTED** CP1555.

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Appendix 1: Glossary & References

Acronyms

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

Acronyms	
Acronym	**Definition**
BSC	Balancing and Settlement Code
BSCP	Balancing and Settlement Code Procedure
CP	Change Proposal
CPC	Change Proposal Circular
DCC	Data Communications Company
DCP	DCUSA Change Proposal
DCUSA	Distribution Connection and Use of System Agreement
DNO	Distributor Network Operator
DTCD	Data Transfer Catalogue Dataflow
DTN	Data Transfer Network
EAC	Estimated Annual Consumption
EMAR	Energy Market Architecture Repository
HH	Half Hourly
HHDA	Half Hourly Data Aggregator
HHDC	Half Hourly Data Collector
IDNO	Independent Distribution Network Operator
LDSO	Licenced Distribution System Operator
MC	Measurement Classes
MHHS	Market-wide Half-Hourly Settlement
MSID	Metering System Identifiers
NETSO	National Electricity Transmission System Operator
NHH	Non-Half Hourly
REC	Retail Energy Code
SMRS	Supplier Meter Registration Service
SVA	Supplier Volume Allocation
SVG	Supplier Volume Allocation Group
TCR	Targeted Charging Review
UMSUG	Unmetered Supplies User Group

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Data flows and data items

Data flows and data items referenced in this document are listed in the table below.

Data Flows and Data Items		
DTCD Code	**Market Message Identifier**	**Name**
D0010	MM00257	Meter Readings
D0030	MM00411	Aggregated DUoS Report
D0036	MM00413	Validated Half Hourly Advances for Inclusion in Aggregated Supplier Matrix
D0275	MM00206	Validated Half Hourly Advances
D0380	MM00363	Half Hourly Advances for Inclusion in Aggregated Supplier Matrix
D0379	MM00361	Half Hourly Advances UTC

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, 3, 4	BSCP502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'	https://www.elexon.co.uk/csd/bscp502-half-hourly-data-collection-for-sva-metering-systems-registered-in-smrs/
3	Targeted Charging Review: Decision and Impact Assessment	https://www.ofgem.gov.uk/publications/targeted-charging-review-decision-and-impact-assessment
3	DCP361 'Ofgem Targeted Charging Review Implementation: Calculation of Charges'	https://www.dcusa.co.uk/change/ofgem-targeted-charging-review-implementation-calculation-of-charges/
10	SVG 2 November 2021 meeting, SVG249	https://www.elexon.co.uk/meeting/svg249/
13	SVG 1 February 2022 meeting, SVG252	https://www.elexon.co.uk/meeting/svg252/

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