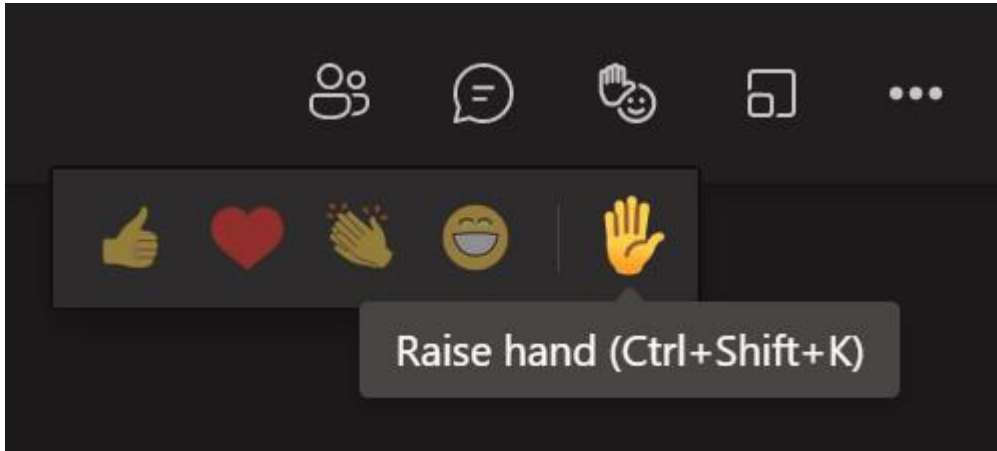


P332 Digital Meeting Etiquette

- Welcome to P332 Workgroup Meeting 12 – we'll start shortly
- No video please to conserve bandwidth
- Please stay on mute unless you need to talk – use the **Raise hand** feature in the menu bar in Microsoft Teams if you want to speak, or use the **Meeting chat**



- Lots of us are working remotely – be mindful of background noise and connection speeds

ELEXION

P332 Workgroup 12

Revisions to the Supplier Hub Principle

24 August 2021

Meeting Agenda & Objectives

- Consider Assessment Procedure Consultation responses
- Finalise the Proposed Solution
- Final views against the BSC Objectives
- Next steps

Agenda Item	Lead
1. Welcome and Meeting objectives	Elliott Harper (Chair)
2. Recap of Workgroup Meeting 11	Paul Wheeler (Lead Analyst)
3. Consider Assessment Procedure Consultation responses and finalise the Proposed Solution	Paul Wheeler
4. Final views against the BSC Objectives	Workgroup
5. Next steps	Paul Wheeler
6. AOB & Meeting close	Elliott Harper



RECAP OF WORKGROUP MEETING 11

Recap of Workgroup Meeting 11 (1 of 3)

- Workgroup Meeting 11 was held on 25 May 2021
- The Workgroup discussed the REC impact on the P332 solution
- SVA Metering activities are moving to the REC from 1 September 2021
- The P332 proposed solution had required all existing and new SVA HH & NHH MOAs and DCs to sign the side letter
- However, SVA MOAs (MEMs) will be Parties to the REC and also be Qualified under the REC
- SVA MOAs will still be recognised as a Party Agent under the BSC, but they won't be Qualified under the BSC and there will be no MOA processes in the BSC as the processes in BSCP514 are moving to the REC
- Therefore the P332 solution was amended in accordance with the Proposer's current thinking and now only applies to existing and new **SVA HH & NHH DCs**

Recap of Workgroup Meeting 11 (2 of 3)

- The Draft Legal Text and Side Letter were amended to remove references to SVA HH & NHH MOAs
- The Draft Legal Text was amended to explain that the Agent has been appointed and also registered in SMRS
- The Side Letter was amended to include limits on liabilities and the acknowledgement that no types of claims are excluded (i.e. Quantum Meruit —“a reasonable sum of money to be paid for services rendered or work done when the amount due is not stipulated in a legally enforceable contract” is allowed)

Recap of Workgroup Meeting 11 (3 of 3)

- Workgroup Members voted on their views against the Applicable BSC Objectives, given the change to the solution
- The majority of the Workgroup initially believed that P332 will be:
 - **neutral** against Applicable BSC Objective (c) (competition)
 - **neutral** or **detrimental** against Applicable BSC Objective (d) (efficient operation and implementation of the BSC arrangements)
 - and should therefore be **rejected** (as the solution is not better than the current baseline)
- A neutral vote is a vote for no change, as it reflects the fact that the change will not better facilitate the Applicable BSC Objective and is therefore not better than the current baseline



ASSESSMENT PROCEDURE CONSULTATION RESPONSES

P332 Assessment Procedure Consultation responses (1 of 23)

- The P332 Assessment Procedure Consultation was issued on 16 July 2021 for 15 WDs, with responses invited by 5pm on 6 August 2021
- Nine consultation responses were received:
 - 3 x Agents: Callisto, IMServ, Stark
 - 4 x Suppliers: Centrica, Drax Group (Opus Energy and Haven Power), ScottishPower (also DC/DA), SSE
 - 1x DNO: Western Power Distribution
 - 1 x MA: Power Data Associates Ltd
- The Workgroup will consider and discuss the consultation responses during today's meeting

P332 Assessment Procedure Consultation responses (2 of 23)

Question	Yes	No	Neutral	Other
1: Do you agree with the Workgroup’s initial view that P332 does not better facilitate the Applicable BSC Objectives than the current baseline?	6	3	0	0

- **Yes** – 3 Agents, 1 Supplier, 1 DNO, 1 MA
 - “We believe sufficient mechanisms already exist within the BSC”
 - “Agent obligations and the Supplier HUB processes are already clearly defined within the Code, along with a formal BSC process for dealing with any non-compliance”
 - “Now that the MOA obligations have moved to the REC, the solution does not add anything to the obligations and provisions that already exist in the BSC”
- **No** – 3 Suppliers
 - “We agree with the Proposer...”
 - “This proposal will also help improve accurate and timely billing for customers for example by ensuring hand held readings are attempted”

P332 Assessment Procedure Consultation responses (3 of 23)

Question	Yes	No	Neutral	Other
1: Do you agree with the Workgroup’s initial view that P332 does not better facilitate the Applicable BSC Objectives than the current baseline?	6	3	0	0

- In their rationale for responding No, ScottishPower stated:
- “The alternative argument that the arrangements are covered by commercial contractual arrangements between the Supplier and the Agent suffers from two fundamental weaknesses:
 - It requires that a Supplier puts in place contractual arrangements with every possible DC whom they might find appointed to their Supplier Hub by a customer. ScottishPower believes this itself is a barrier to entry for Suppliers
 - If the Supplier does not contract at the outset with all possible DCs and instead awaits an appointment request for a CPA DC then the Supplier finds itself having to contract with a DC who knows it is preferred by the Supplier’s customer. This creates an uneven playing field on which the Supplier is at a commercial disadvantage to the customer’s agent.”

P332 Assessment Procedure Consultation responses (4 of 23)

Question	Yes	No	Neutral	Other
2: Do you agree with the Workgroup that the draft legal text in Attachment A delivers the intention of P332?	7	2	0	0

- **Yes** – 2 Agents, 4 Suppliers, 1 DNO
 - “If this modification is approved draft legal text is correct”
 - “We agree the draft legal text delivers the intention of P332”
- **No** – 1 Agent, 1 MA
 - “As stated in the response to Q1 the “intention” of the MOD has always been unclear”
 - “Agree that the draft legal text was amended to explain that the Agent must be appointed and registered in SMRS for this letter to apply, however; do not agree that the legal text delivers the intention as these are already BSC requirements for SVA agents”

P332 Assessment Procedure Consultation responses (5 of 23)

Question	Yes	No	Neutral	Other
3: Do you agree with the Workgroup’s recommended Implementation Date?	9	0	0	0

- **Yes** – 3 Agents, 4 Suppliers, 1 DNO, 1 MA
 - “An Implementation Date of 5 WDs after Ofgem approval would give DCs a 6-month period to sign the side letter before it takes effect”
 - “Whist we do not support the modification, if implemented we agree with the recommended date of implementation”

P332 Assessment Procedure Consultation responses (6 of 23)

Question	Yes	No	Neutral	Other
4: Do you agree with the Workgroup that there are no other potential Alternative Modifications within the scope of P332 which would better facilitate the Applicable BSC Objectives?	8	0	1	0

- **Yes** – 2 Agents, 4 Suppliers, 1 DNO, 1 MA
 - “We agree that there are no other potential Alternative Modifications within the scope of P332 which would better facilitate the Applicable BSC Objectives”
- **No comment** – 1 Agent
 - “We do not have an alternative, but there may be others not considered”

P332 Assessment Procedure Consultation responses (7 of 23)

Question	Yes	No	Neutral	Other
5: Do you agree with the Workgroup’s assessment of the impact on the BSC Settlement Risks?	4	4	0	1

- **Yes** – 3 Suppliers, 1 DNO
 - “We agree with the Workgroups assessment of the impact on the BSC Settlement Risks”
 - “We agree with the Workgroup’s assessment that as no quantifiable evidence has been able to be provided it is difficult to quantify the impact of P332 against the BSC Settlement Risks”
- **No** – 2 Agents, 1 Supplier, 1 MA
 - “The assessment of risks is hypothetical based on a worst-case scenario using the anecdotal evidence provided”
 - “We do not believe that P332 would impact settlement risks as it unlikely to change the behaviour of DCs, and suppliers will not impose any breaches to the side letter as the costs and efforts of going to court would be too high”
- **Other** – 1 Agent – “We were not clear from the report how the P332 solution would impact settlement risks”

P332 Assessment Procedure Consultation responses (8 of 23)

Question	Yes	No	Neutral	Other
6: Do you agree with the Workgroup’s assessment that P332 does impact the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the BSC?	6	0	3	0

- **Yes** – 2 Agents, 3 Suppliers, 1 DNO
 - “As BSC Section J 3.3 is impacted, the EBGL process will need to be followed”
- **No** – 1 Agent, 1 Supplier, 1 MA
 - “We have no comment to make on this question”

P332 Assessment Procedure Consultation responses (9 of 23)

Question	Yes	No	Neutral	Other
7: Do you have any comments on the impact of P332 on the EBGL objectives?	0	6	3	0

- **No** – 2 Agents, 3 Suppliers, 1 DNO
- **No comment** – 1 Agent, 1 Supplier, 1 MA

P332 Assessment Procedure Consultation responses (10 of 23)

Question	Yes	No	Neutral	Other
8: Will P332 impact your organisation?	4	5	0	0

- **Yes** – 3 Agents, 1 Supplier
 - “Review and renegotiate current contractual agreements with Suppliers. Review end of contract processes and amend contractual arrangements where needed. Data checks for missing de-appointments”
 - “Additionally we would need to review, and potentially amend, contracting processes in which the supplier often appoints us to sites, under a letter of intent, pending the formal contract being signed. We would need to understand whether this practice could leave us exposed and if so, whether we need to reject such appointments, thus impacting suppliers”
 - “Minimal impact. Only from the perspective of the requirement as a qualified agent, to sign the letter. We would not see any changes required to our current BSC obligations”
- **No** – 3 Suppliers, 1 DNO, 1 MA
 - “We do not believe we will need to amend any systems, documents or processes as a result of implementing P332”

P332 Assessment Procedure Consultation responses (11 of 23)

Question	Yes	No	Neutral	Other
9: Will your organisation incur any costs in implementing P332?	4	7	0	1

- **Yes** – 1 Agent
 - “some amendments to contractual, appointment and potentially billing processes”
- **None** – 2 Agents, 4 Suppliers, 1 DNO
 - “Minimal impact. Only from the perspective of the requirement as a qualified agent, to sign the letter. We would not see any changes required to our current BSC obligations”
- **Other** – 1 MA
 - “Not applicable”

P332 Assessment Procedure Consultation responses (12 of 23)

Question	0-6 months	6-12 months	>12 months	Other
10: How long (from the point of approval) would you need to implement P332?	4	0	0	5

- **0-6 months** – 2 Agents, 2 Suppliers
 - “The timescales proposed for implementation combined with the 6 months to get the side letter signed seem to be appropriate”
- **No impact or N/A** – 1 Agent, 2 Suppliers, 1 DNO, 1 MA
 - “No impact”
 - “As P332 will not impact our organisation we feel this question would be better answered by HH and NHH DC’s and Suppliers”

P332 Assessment Procedure Consultation responses (13 of 23)

Question	Yes	No	Neutral	Other
11: Do you agree with the Workgroup that the solution should apply to all SVA HH & NHH DCs?	5	4	0	0

- **Yes** – 1 Agent, 3 Suppliers, 1 DNO
 - “If P332 were to be approved, we feel that a consistent approach should be adopted to ensure a simplified management of the requirement to sign a side letter and therefore P332 should apply to all SVA HH and NHH DC’s”
- **No** – 3 Agents, 1 Supplier, 1 MA
 - “We do not believe the modification should be implemented and, therefore, should not apply to any SVA DCs”

P332 Assessment Procedure Consultation responses (14 of 23)

Question	Yes	No	Neutral	Other
11: Do you agree with the Workgroup that the solution should apply to all SVA HH & NHH DCs?	5	4	0	0

- In their rationale for responding Yes, ScottishPower stated that “they would like to see the side letter apply to Data Aggregators too”
 - The question of which Supplier Agents the solution should apply to has been discussed by the Workgroup
 - The Proposer stated that Customer Preferred Agents were usually operating in the role of MOA and/or DC
 - Elexon previously stated that the nature of DAs meant it was unlikely there would be selective non-compliance and any significant issues impacting Settlement would likely be picked up by Elexon or the Performance Assurance Framework (PAF)

P332 Assessment Procedure Consultation responses (15 of 23)

Question	Yes	No	Neutral	Other
12: Do you agree with the obligations that the Workgroup are placing on SVA HH & NHH DCs in the side letter?	4	5	0	0

- **Yes** – 3 Suppliers, 1 Agent
 - “We agree with the obligations that are being placed on SVA HH and NHH DCs in the side letter as this will ensure Customers receive comparable levels of service regardless of whether their Agent is Customer preferred or Supplier preferred. In addition, the obligations would mean that Suppliers are not disadvantaged commercially by Customers contracting directly with Agents”
 - “If this modification is approved these obligations are correct”
- **No** – 2 Agents, 1 Supplier, 1 DNO, 1 MA
 - “Agent obligations and the Supplier HUB processes are already clearly defined within the Code, along with a formal BSC process for dealing with any non-compliance”
 - “I do not believe the changes will make any difference to settlement”

P332 Assessment Procedure Consultation responses (16 of 23)

Question	Yes	No	Neutral	Other
13: Do you agree with the Workgroup that the draft side letter in Attachment B delivers the intention of P332?	5	4	0	0

- **Yes** – 4 Suppliers, 1 DNO
 - “We agree that draft side letter B delivers the intention of P332”
 - “Whilst we do not support P332, we agree that the draft side letter delivers its intent”
- **No** – 3 Agents, 1 MA
 - “Please see the marked up version returned with this response denoting changes proposed by our Legal Team”
 - “As said several times I do not know what the intention of P332 was, therefore it is impossible to determine if this achieves the intention of P332”

P332 Assessment Procedure Consultation responses (17 of 23)

Question	Yes	No	Neutral	Other
13: Do you agree with the Workgroup that the draft side letter in Attachment B delivers the intention of P332?	5	4	0	0

- In IMServ’s response (No), they provided a marked up version of the side letter, denoting changes proposed by their Legal Team:

No Relevant Party Agent or Supplier shall in any circumstances be liable in respect of any breach of this Letter Agreement to the other for:

*(a) any loss of profit, **loss of contract, loss of business**, loss of revenue, loss of use, loss of contract, loss of goodwill, or increased cost of working; or*

b) any indirect or consequential loss.

- Loss of contract already exists in paragraph a) but loss of business can be included, if the Workgroup are in agreement

P332 Assessment Procedure Consultation responses (18 of 23)

Question	Yes	No	Neutral	Other
13: Do you agree with the Workgroup that the draft side letter in Attachment B delivers the intention of P332?	5	4	0	0

- IMServ (No) also proposed the addition of the additional paragraph below:

Notwithstanding any other provision of this Letter Agreement, you agree (for yourself and on behalf of Suppliers) that:

- (a) where we do not have a contract with an end user customer and we do not have a contract with a Supplier in respect of any Metering System, the Supplier shall de-appoint us promptly (and in any event within [3] Working Days) of notification from us; and
 - b) the Supplier shall reimburse us at our normal rates for any services we perform until such time as we are de-appointed.
- However, it would not be possible to place an obligation on Suppliers through the side letter, as the side letter is bilateral between Elexon and DCs
- The proposed insertion goes into commercial arrangements, which is outside the scope of the BSC

P332 Assessment Procedure Consultation responses (19 of 23)

Question	Yes	No
14: Do you have any further comments on P332?	6	3

- SSE - We believe that the implementation of P332 would create a lot of unnecessary and burdensome administration, and would deliver no benefit. Also, given the planned timescale of MHHS implementation, it would only be in place for a limited amount of time

P332 Assessment Procedure Consultation responses (20 of 23)

Question	Yes	No
14: Do you have any further comments on P332?	6	3

- Stark - Whilst we have no problem in principle with the concept of the letter, we still do not see how this will achieve the desired impact & support the majority working group recommendation that P332 be rejected. All that the letter is ensuring is that DC agents who currently perform will continue to do so. In principle, in lieu of an actual contract the letter may provide incentive to arrange an actual contract, however, there has been insufficient evidence to suggest this would be a solution to the perceived problem. During the PAF review there was support for greater transparency of the PAF monitoring information. This could allow Suppliers and Customers to make more informed judgments in selecting their agents & by publishing the information it will encourage poor performers to improve in areas that Supplier's perceive they have no influence due to lack of commercial arrangements. We also have a concern that, should the letter be approved, it could be used to provide Suppliers with a means to influence Customers against using their preferred agents
- Elexon are continuing to progress the PAF Review recommendations, as part of our continuous improvement processes. One area that is currently being progressed (which links directly to this particular area identified in the Review), is an enhanced Peer Comparison approach. This work is underway at the moment, and will necessitate a further formal BSC Change (either as a CP or Modification) – therefore as it progresses, Elexon will be undertaking the usual industry consultations

P332 Assessment Procedure Consultation responses (21 of 23)

Question	Yes	No
14: Do you have any further comments on P332?	6	3

- IMServ:
- There is no actual description or quantification of the process failings that this modification is seeking to address: there is no factual description of scope, scale and impact and whether the issues are local to specific parties only. Therefore, it has not been established whether there is any failing of the market processes or whether this is a failing of commercial processes, for some parties only, outside of the BSC.
- CPAs have been a part of the Market for many years: their existence cannot and should not be assumed to lead to issues and settlement impact.
- Whilst some evidence has been included, or referred to, in the consultation, this is anecdotal rather than factual. However, factual evidence is available through the BSC Audit , as the agent processes, which have been noted, are all scrutinised on an annual basis by the BSC auditor. This review also considers the cause of any failure on an individual mpan basis: to-date the factual evidence is that there has not been any non-compliance identified which is the result of the agent being appointed by the customer, i.e. a CPA.

P332 Assessment Procedure Consultation responses (22 of 23)

Question	Yes	No
14: Do you have any further comments on P332?	6	3

- IMServ (continued):
- In all our agent roles at IMServ we have a significant number of CPA type appointments; however, the mpans under these arrangements are dealt with in the same way as those in which there is a direct supplier relationship. To be clear, there is no way of distinguishing these mpans in any of our internal systems therefore the service is the same for all. We run multiple management reports on processes and settlement performance and again, this is by total portfolio as opposed to contract type. Indeed, some of the suppliers with the highest settlement performance (over industry standard) have a large proportion of CPA sites.
- This is proof that the current industry processes are adequate and no change is required other than better use of the existing processes for dealing with any valid non-compliance.

P332 Assessment Procedure Consultation responses (23 of 23)

Question	Yes	No
14: Do you have any further comments on P332?	6	3

- Power Data Associates - This is an example of a Modification that was not well drafted or explicit in defining the problem or the potential solution. The BSC change team and the BSC Panel should consider the effort that has been expended and learn any lessons to ensure there is sufficient rigor in approving any further Modifications
- Scottish Power - ScottishPower would like to see whether workgroup votes were divided on partisan grounds (with Suppliers for and Agents against). Members of workgroups are not supposed to vote on partisan grounds
- Western Power Distribution - In addition to our concerns in respect of the benefit to industry as per our comments above, we also have concerns about the changes required to Section J. This section is included in the BSC consequential changes for REC v3.0 – would this P332 if approved require assessment by REC Change Board?
 - Elexon’s initial view is that P332 if approved would not require assessment by the REC Change Board



TERMS OF REFERENCE REVIEW

Terms of Reference

P332 Specific ToR

- a) What issues are caused by customers choosing Agents?
- b) What is the materiality of the issues?
- c) What means are presently available to address the issues?
- d) What is the best way in principle to address the issues?

Standard ToR

- e) What is the most appropriate Implementation Date?
- f) What changes are needed to BSC documents, systems and processes to support P332 and what are the related costs and lead times?
- g) Are there any Alternative Modifications?
- h) Does P332 better facilitate the Applicable BSC Objectives compared with the current baseline?
- i) Does P332 impact the EBGL provisions held within the BSC, and if so, what is the impact on the EBGL Objectives?

Terms of Reference Summary

Item	Status
P332 Specific Terms of Reference	Complete
Costs and impacts	Complete
EBGL Article 18 impacts	Yes
Self-Governance?	Complete – not SG due to EBGL impacts
Any Alternative Modifications?	None raised yet
Views against Applicable BSC Objectives	Final views at this WG

Implementation Date

- The proposed Implementation Date is **5 WDs** after Ofgem's decision
- SVA HH & NHH DCs would then have **6 months** to sign the side letter
- The Final Modification Report is due to be sent to Ofgem by 17 November 2021
- Ofgem's KPI for decision is 25 days, so a decision could be received in December 2021 / January 2022 → side letter required to be signed around June / July 2022

Costs and impacts

Costs:

- This is a document only change. No system changes are required for this Modification
- The cost of updating BSC documents will be less than £1k

Impacts:

- BSC Section J 'Party Agents and Qualification Under the Code'
- Qualification side letter: Qualification Deed pursuant to BSC Section J3.3.6
- Suppliers, SVA HH & NHH DCs

Self-Governance criteria - EBGL Article 18 terms and conditions of balancing

In addition to the Self-Governance criteria, any Modification that seeks to amend BSC provisions constituting European Balancing Guideline (EBGL) Article 18 terms and conditions related to balancing cannot be progressed as Self-Governance. This is because the EBGL requires any Amendments to those terms and conditions to undergo a separate EBGL Amendment process, requiring the Modification to be approved by Ofgem.

Section J 3.3 is identified as impacted by P332. The relevant EBGL sections are:

- Section J:
 - Sub-Sections: **3.3**, 3.6, 3.7, 3.8
- P332 therefore impacts EBGL Article 18 terms and conditions on balancing
- Elexon believe that P332 is neutral against the EBGL Objectives, but as Section J 3.3 is impacted, we need to follow the EBGL process

Self-Governance criteria

- P332 cannot be Self-Governance as it impacts on the EBGL Article 18 terms and conditions
- Section J 3.3 is identified as impacted by P332
- The Proposer believed that, even without Article 18 impact, P332 should go to Ofgem for decision as it materially impacts on competition because it will enable Suppliers to better manage Agents with who they don't have a commercial contract



APPLICABLE BSC OBJECTIVES

Applicable BSC Objectives

- a) The efficient discharge by the Transmission Company of the obligations imposed upon it by the Transmission Licence
- b) The efficient, economic and co-ordinated operation of the national electricity transmission system
- c) Promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity
- d) Promoting efficiency in the implementation and administration of the balancing and settlement arrangements
- e) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency [for the Co-operation of Energy Regulators]
- f) Implementing and administering the arrangements for the operation of contracts for difference and arrangements that facilitate the operation of a capacity market pursuant to EMR legislation
- g) Compliance with the Transmission Losses Principle

Proposer Views: Applicable BSC Objectives

The Proposer initially believed that P332 would better facilitate Applicable BSC Objectives c) and d)

c) Promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity

The Proposer contends that this Objective would be better facilitated because the Modification would ensure customers would receive comparable levels of service regardless of whether their Agent is customer appointed or Supplier appointed. In addition, the Proposer contends that P332 would mean that Suppliers are not disadvantaged commercially by the appointment of Agents by customers .

d) Promoting efficiency in the implementation and administration of the balancing and settlement arrangements

The Proposer contends that this Objective would be better facilitated because Agents who have signed the proposed side letter would lead to a more consistent level of performance by Agents.

Applicable BSC Objectives – initial views prior to Assessment Procedure Consultation

Member	(c)	(d)
Steven Bradford (Proposer)	+	+
Seth Chapman	N	-
Dermot Hearty	+	+
Tom Chevalier	N	-
Gavin Somerville	N	+
Jacqui Barton	N	N
Lee Stone	N	N
Mark Bellman	+	+
Nik Wills	N	N
Robert Thomas	N	+
Clare Hannah	N	-
Phil Russell	N	-



VOTING

Voting

- Eligible Voting Members will be invited to provide their final views against the Applicable BSC Objectives
- The final views will be captured in the Assessment Report



PROGRESSION PLAN & NEXT STEPS

Progression Plan and Next Steps

- Today's Workgroup discussions and final views against the BSC Objectives will be written up in the draft Assessment Report
- Draft Assessment Report will be sent to Workgroup for 2 WDs review on Friday 27 August 2021
- End of Workgroup review at 5pm on Tuesday 31 August 2021 (note that 30 August 2021 is Bank Holiday Monday)
- Assessment Report submitted to BSC Panel on 2 September 2021 (final paper deadline)
- Assessment Report presented to BSC Panel on 9 September 2021
- Report Phase Consultation from 15 September 2021 to 15 October 2021 (needs to be one month due to EBGL)
- Possible WG within a week or so from end of RPC (w/c 18 October 2021)
- Draft Modification Report present to BSC Panel on 11 November 2021
- Final Modification Report submitted to Ofgem for decision by 17 November 2021



ANY OTHER
BUSINESS?

ELEXON

THANK YOU

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24 August 2021