

CP Assessment Report

CP1532 'Reduce Half Hourly Change of Supplier timelines to meet the Initial Settlement Run'

ELEXON



Committee

Supplier Volume Allocation Group (SVG)

Recommendation

Approve

Implementation Date

24 February 2022
(February 2022 BSC Release)



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About This Document

This document is the Change Proposal (CP) Assessment Report for CP1532 which ELEXON will present to the SVG at its meeting on 1 September 2020. The Committee will consider the proposed solution and the responses received to the CP Consultation before making a decision on whether to approve CP1532.

There are five parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, and proposed implementation approach. It also summarises the SVG's initial views on the proposed changes and the views of respondents to the CP Consultation.
- Attachment(s) A-C contain the proposed redlined changes to deliver the CP1532 solution.
- Attachment D contains the full responses received to the CP Consultation.

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Why change?

One of the main aims of [Ofgem's Switching programme](#) is to allow customers, whether domestic or non-domestic, to change Supplier no more than two Working Days (WDs) after the day on which the switch request is submitted. Whilst it is expected that there will be longer Change of Supplier (CoS) lead times for larger Half Hourly (HH) customers and group customers, the shortened lead times are likely to apply for smaller non-domestic and elective HH domestic customers.

Even if all Agents and Suppliers utilise the maximum amount of time currently available to them, the Non Half Hourly (NHH) CoS process will complete by the Initial Settlement Volume Allocation Run (SF Run) – carried out at approximately 16 Working Days. However, this is not the case in the Half Hourly CoS process, which can currently take up to 22 WDs and would therefore miss the SF Run, resulting in estimated volumes of energy being allocated in Settlement.

Whilst Suppliers and Agents usually operate within the maximum timescales available, it is preferable that the CoS processes are designed to complete by the SF Run, rather than relying on good operational practices. Timescales for the NHH CoS process were shortened in November 2014 following the implementation of Change Proposal [CP1405 'Facilitating Faster Switching in the NHH Market'](#). This Change Proposal (CP) seeks to align the HH timescales with those of the NHH process, where it is appropriate to do so.

Solution

This CP will update CoS timescales within [BSCP502](#), [BSCP504](#) and [BSCP514](#) to ensure that all activities can be completed by the Initial Settlement Run (SF). It will also align appointment and de-appointment timescales (in both the NHH and HH processes) with the expected changes introduced to facilitate the Switching programme.

Impacts and costs

CP1532 will impact Suppliers, MOAs, NHHDCs and HHDCs. Impacts were identified by seven respondents, identifying process and system changes would be required to implement the solution. Seven respondents identified costs would be incurred in implementing these changes, one Supplier noting implementation costs of £20k plus £10-15k per annum enduring costs.

Implementation

CP1532 is proposed for implementation on **24 February 2022** as part of the February 2022 BSC Release. This date has been moved from February 2021 following consultation responses requesting implementation be aligned with the Central Switching Service and Switching Significant Code Review go-live dates.

Recommendation

We invite the **SVG** to:

- **AGREE** the amendments to the proposed redlining for BSCP502, BSCP504 and BSCP514 for CP1532 made following the CP Consultation;
- **APPROVE** the proposed changes to BSCP502, BSCP504 and BSCP514 for CP1532; and
- **APPROVE** CP1532 for implementation on 24 February 2022 as part of the February 2022 BSC Release; and
- **NOTE** that:
 - The Implementation Date has been extended from 25 February 2021 in response to consultation responses.

2 Why Change?

What is the Switching Programme?

The [Retail Energy Code \(REC\)](#) and [Central Switching Service \(CSS\)](#) are key components of Ofgem's Switching Programme. The objective of the Switching Programme is to improve customers' experience of switching, leading to greater engagement in the retail energy market by designing and implementing a new switching process that is reliable, fast and cost-effective. The [Retail Code Consolidation \(RCC\) Significant Code Review \(SCR\)](#) will consolidate existing Industry Codes into the REC.

RCC SCR changes are expected to be implemented on 1 April 2021. However, we are aware that Ofgem are reviewing the SCR plans in response to COVID-19.

The [Switching SCR](#) will implement a new switching process, utilising the CSS and requiring consequential changes to the Change of Supplier, registration and Agent processes in the BSC. These changes are highlighted in redlining sent to Ofgem on 31 March 2020 and are not part of this CP. Switching SCR changes were expected in summer 2021, but as a result of the Covid-19 pandemic and following a recent Ofgem announcement, are likely to be delayed until at least September 2021.

Issue 86 Background

ELEXON, on behalf of the [BSC Panel](#), [was requested](#), to inform Ofgem how processes relating to CoS and Change of Agent (CoA) would be impacted by the Switching Programme. These processes will impact:

- Data Collectors (DCs)
- Data Aggregators (DAs)
- MOAs
- Suppliers

Issue 86 was raised by ELEXON to consider the changes needed to the BSC and its subsidiary documents to facilitate the Switching and RCC SCRs. As part of [Issue 86 Review of processes potentially impacted by Ofgem's Switching Programme](#), the workgroup was asked to identify where processes, particularly timescales, will need to be amended to meet delivery of the RCC and Switching SCRs in 2021. If there was an opportunity to implement changes ahead of CSS go-live, they would be considered on the basis there was no risk to impairing REC and/or CSS related Changes. This proposal is one such example of this.

What is the issue?

The Issue 86 workgroup identified inconsistencies around the CoS process within BSCP502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS', BSCP504 'Non Half Hourly Data Collection for SVA Metering Systems Registered in SMRS' and BSCP514 'SVA Meter Operations for Metering System Registered in SMRS'. In particular an inconsistency between the processes were identified following the implementation of CP1405 which shortened the timescales in the NHH CoS process, but not the HH CoS process. In many cases there is no clear rationale for allowing longer timescales in the HH CoS process, particularly as most responses to requests from other participants should be automated in all bar error situations.

It is not currently possible for HH Supplier Agents to complete CoS activities by the Initial Settlement Run, if the CoS process is initiated two WDs ahead of the Supply Start Date (SSD) and if Suppliers and their Agents use the maximum lead times available within the relevant BSCPs. If Suppliers and Agents use the maximum lead time available to them, this could result in estimated data entering Settlement, due to the subsequent Agent appointment and data transfer processes not completing in time to provide actual data in the Initial Settlement Run.

The current arrangements are therefore not aligned with Ofgem's Switching Programme objectives, as delays to Settlement may also result in delays to customer billing.

The Issue 86 workgroup also concluded that the timescales for the D0155 'Notification of Meter Operator or Data Collector Appointment and Terms' and D0151 'Termination of Appointment or Contract by Supplier' across the HH and NHH processes in the BSCPs would benefit from alignment with the changes proposed in the REC.

An example of this is in the proposed changes in BSCP502 Clause 3.2.7 Concurrent Change of Supplier and HHDC for an existing SVA Metering System to change the timing of sending a D0155 to 'by SSD – 1WD'. An equivalent clause in BSCP504 for NHHDCs, 3.2.6 Change of Supplier for an existing SVA Metering System has a D0155 to be sent 'As required'. The proposed redlining for this CP changes this to 'by SSD – 1WD' to ensure uniformity with the new REC processes.

Updating and clarifying the timelines around the CoS process within these BSCPs will align with the objectives of the REC and Switching SCR in 2021 and ensure that the HH CoS process, in particular, will complete by the SF Run, by design rather than good practice.



Proposed solution

This CP will update CoS timescales within BSCP502, BSCP504 and BSCP514 to ensure that all activities can be completed by the Initial Settlement Run, which is not currently possible with the existing Half Hourly timescales if Suppliers and Agents use the maximum lead times available to them in the BSCPs.

It will also align the sending of D0155 and D0151 dataflows in the BSCPs for HH and Non Half Hourly (NHH) CoS processes so they are consistent across the documents and appointment of Agent activities.

Dataflows within BSCPs that will have timescale changes (no changes to the dataflow required):

- [D0011: Agreement of Contractual Terms](#)
- [D0148: Notification of Change to Other Parties](#)
- [D0151: Termination of Appointment or Contract by Supplier](#)
- [D0155: Notification of Meter Operator or Data Collector Appointment and Terms](#)
- [D0170: Request for Metering System Related Details](#)
- [D0268: Half Hourly Meter Technical Details](#)
- [D0289: Notification of MC/EAC/PC](#)
- [D0302: Notification of Customer Details](#)

Proposer's rationale

By ensuring the HH CoS process is completed by the SF Run and ensuring Agents are in place and the relevant data has been transferred in order to enable them to collect actual data, this will reduce the amount of estimated data that Suppliers are reported against, assisting in their ability to settle at least 99% of their energy for import sites on Actual Energy and reducing potential Supplier Charges for not achieving this or ultimately entering the Error and Failure Resolution (EFR) process.

Settlement

Settlement Risk 0081 states 'A Supplier settles at least 99% of its energy for imports sites on Actual Energy at SF and R1.' The initial Settlement Run (SF) is +16 Working Days following a given Settlement Day.

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4 Impacts and Costs

Central impacts and costs

CP1532 will require changes to BSCP502, BSCP504 and BSCP514. No system changes are required and there will be no impact on BSC Agents.

The central implementation costs for CP1532 will be approximately £480 (two ELEXON man days) to implement the relevant document changes.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none">• BSCP 502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'• BSCP504 'Non Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'• BSCP514 'SVA Meter Operations for Metering Systems Registered in SMRS'	None

BSC Party & Party Agent impacts and costs

CP1532 will impact Suppliers, MOAs, NHHDCs and HHDCs. Impacts were identified by seven respondents, identifying process and system changes would be required to implement the solution. Seven respondents identified costs would be incurred in implementing these changes, one Supplier noting implementation costs of £20k plus £10-15k per annum enduring costs.

No other BSC Parties or Party Agents have been identified as impacted.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
Supplier	Changes will be required to implement the solution.
MOA	
NHHDC	
HHDC	

Originally Recommended Implementation Date

CP1532 was originally proposed for implementation on 25 February 2021 as part of the [February 2021 BSC Release](#). At the time of going to consultation ELEXON recognised this was a short time period for affected parties to implement any necessary changes but following Issue 86 guidance were attempting to implement the proposed changes through prior to the Switching and REC SCR's.

Consultation Feedback

Three Suppliers and one Supplier Agent identified concerns with the proposed Implementation date, noting the level of proposed system and process change has better alignment alongside the Switching SCR changes in 2022. Based on this feedback ELEXON contacted all respondents as well as Issue 86 members and presented the following Implementation options:

1. Proceed with CP solution and implementation date of February 21
2. Proceed as is without the appointment/de-appointment deadlines and deliver via a later cross-code BSC/REC change
3. Target Feb 2021 but with an appointment/de-appointment timescale that doesn't become applicable until CSS/Switching SCR go-live
4. Schedule implementation to align with CSS/Switching SCR go-live (February 2022).
5. Alternative suggestion

We received nine responses to the options outlined, with five respondents, including all four Supplier respondents plus one MOA, requesting option four that the Implementation date be aligned with CSS/Switching SCR go-live. An additional two Supplier Agent respondents provided neutral feedback but stated the choice should be the preference of Suppliers.

Recommended Implementation Date

In light of the consultation responses and additionally requested feedback we believe there is enough evidence and industry will to postpone the proposed Implementation Date by one year, to **24 February 2022** to align with the CSS/Switching SCR go-live date. We are aware the CSS/Switching go-live date is still to be determined and is currently set as "early 2022" with code changes directed in September 2021. ELEXON will return to SVG nearer the time of implementation if dates do not correspond and materially impact market participants.

We also believe this timeline gives affected parties greater time to remobilise from COVID-19.

Communication

We are very aware of the importance of timely and clear communication, where CP1532 is approved, on the implementation timeframes and requirements for this CP. We plan to communicate this change, where approved via:

- The normal BSC change distribution list;
- [Newscast](#);
- ELEXON website and social media channels; and
- To Suppliers and Supplier Agents via ELEXON Operational Support Managers

SVG's initial views

The Supplier Volume Allocation Group (SVG) considered CP1532 at its meeting on 3 March 2020 ([SVG229/17](#)) as part of Other Business and Matters Arising, rather than via the usual Progression Paper. Following the Issue 86 recommendation to progress this CP there was not sufficient time to submit a Progression Paper without adding an extra month to the progression timeline of this CP. The view was taken that it was better to progress the CP in expedited timescales and send straight to consultation, rather than wait a further month to present a more thorough Progression Paper.

The SVG confirmed they were happy for the CP to go straight to consultation phase and did not ask for any additional questions to be added to the CP Consultation.

7 Industry Views

This section summarises the responses received to the CP Consultation. You can find the full responses in Attachment D.

Summary of CP1532 CP Consultation Responses

Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1532 proposed solution?	8	2	0	0
Do you agree that the draft redlining delivers the intent of CP1532?	7	3	0	0
Will CP1532 impact your organisation?	7	2	1	0
Will your organisation incur any costs in implementing CP1532?	7	2	1	0
Do you agree with the proposed implementation approach for CP1532?	5	3	1	1
Do you have any further comments on CP1532?	2	8	-	-

CP Responses

Responses were received from ten participants including Suppliers, a non-BSC party representing Meter Operators, a Distributor and Supplier Agents including NHHDCs, MOAs, and HHDCs.

Solution

One Supplier disagreed with the proposed solution due to alignment with Ofgem's Switching Programme. These concerns were reflected in views of other Suppliers to the originally proposed Implementation Date of February 2021 and have contributed to ELEXON's revised view on when to implement.

An MOA outlined an issue with the solution in respect of section 5.2.4.8 where a MOA is required to send the D0268 within 2 WDs of request and would prefer this increased to 3 WDs. Elexon notified the respondent this aligns with the NHH timescales. The old MOA should already have the MTD, so sending it on request from the new MOA should be quick. The timescales for sending the MTD to other participants has not been changed. In terms of the example of a change of contract, the timescales for sending MTD on change of MOA have not been changed - this is still 5 working days. It is only on CoS that the timescales have been shortened.

Impacts and Costs

Impacts were identified by seven respondents, across all Market Roles, identifying process and system changes would be required to implement the solution. Seven respondents identified costs would be incurred in implementing these changes, one Supplier noting implementation costs of £20k plus £10-15k per annum enduring costs.

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Implementation Date

As outlined in the Implementation Approach section we are seeking to move the Implementation Date back to 24 February 2022 to align with the CSS and Switching SCR following consultation responses and additional industry feedback.

Comments on the proposed redlining

A number of comments were submitted on the proposed redlining by respondents, ELEXON have responded to all parties and updated the BSCPs where outlined below. We do not believe these are material changes to the solution, as the proposed changes provide greater clarity over the updated processes within the relevant BSCPs.

BSCP504 has also been updated to include housekeeping changes.

Comments on the CP1532 Proposed Redlining		
Document & Location	Comment	ELEXON's Response
BSCP502 3.2	Similar lack of recognition of the D0262 rejection.	Rejected appointments have generally not been included in the BSCPs as they are a contractual matter between the Supplier and the agent. From a Settlement point of view, we are only really interested in accepted appointments.
BSCP502 3.2	This section has never made complete sense. The MOP timetable of activities is driven off "Within 5 WD of the installation and commissioning of MS." whilst the HHDC and Supplier activities are driven from "On appointment of new HHDC" with no link between the two. A HHDC could therefore receive a D268 from a MOA before the D155 from the Supplier. Perhaps this could be tidied up and a more logical timetable be set?	Once the MOA has been appointed, arranged for a site visit to install a Meter and sent the D0268 to the HHDC, the HHDC should have received an appointment, especially if the Supplier appoints the MOA and the HHDC at the same time.
BSCP502 3.2.3.7	I would prefer the BSCP provide greater clarity on the "By SSD" statement. I presume it means by SSD of the new appointment but it isn't clear. Also does "by SSD" mean it can be carried out on SSD as timescales for the D0155 provision is by SSD-1? Previous version is last date of Supplier	Updated wording to By New Supplier SSD

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Comments on the CP1532 Proposed Redlining		
Document & Location	Comment	ELEXON's Response
	appointment which is a day before SSD of the new appointment. Is this an intended difference? Is there a definition of Supply Start Data anywhere (not in this BSCP or the BSC as far as I am aware)?	
BSCP502 3.2.3.7	Similar to points on BSCP514 for "By SSD"	Updated wording to By New Supplier SSD
BSCP502 3.2.4.2	<p>I am not sure what this activity actually is "Sufficient details of HHDC's appointment in respect of a SVA MS to enable the HHDC to perform its HHDC functions. These details shall include the relevant SVA MSID and the Identifiers for the MOA and, as the case may be, the HHDA, the LDSO and the applicable GSP Group. The details shall also include the Settlement Days for which the HHDC and HHDA are appointed."</p> <p>The HHDC cannot yet record who the MOA or HHDA are since the D148 has yet to arrive.</p> <p>As this is an internal HHDC process, and at this point in time the HHDC would not have MS details, can this step be removed, we don't think it has any value - If the action is to just respond with a D0011, these other words are superfluous and should be removed each time they occur.</p>	We removed this text as suggested.
BSCP502 3.2.4.5	<p>If the MOA is now getting the D148 later this extends the time by which the D268 is sent from MOP to HHDC as the MOP issues the flow 'Within 5 WD of notification of new HHDC'.</p> <p>As discussed with Andrew Grace, we agree that this is a trade off against a more robust appointment process and is unlikely to have a significant material effect.</p>	No issue
BSCP502 3.2.5.1	I would prefer to see "Within 1 WD of receipt of D0011 from MOA"	Wording updated as suggested

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Comments on the CP1532 Proposed Redlining		
Document & Location	Comment	ELEXON's Response
BSCP502 3.2.6.1	This is an odd one as it requires the receipt of the D0011 from the HHDA where there is currently no obligation in BSCP503 on the HHDA to submit the D0011 in response to appointment notification. Either make changes to BSCP503 and formalise the appointment process as a contractual relationship between the Supplier and the HHDA or I suggest stating "Within 1 WD of receipt of D0172 or D0213".	Updated wording to "within one WD of confirmation of change of HHDA (receipt of D0172, D0213 or D0011)."
BSCP502 3.2.7.1 & 3.3.1.3	Missing from this clause is the optional sending of a D0302 to an HHDC for Supplier Serviced MPANs. Also, although not relevant to the proposed change the optional sending, and therefore, I presume, holding of D0302 data by an HHDC for EHH Meters will mean the HHDC retains personal information (name and contact details) of the consumer. Has this retention been assessed for GDPR rules? It is an area, as an HHDC considering processing EHH, that we are concerned about as we will not need the information for data retrieval or data collection purposes.	We consider this to be outside of the scope of this CP as it is part of the existing process.
BSCP504 3.2.6.4(a)	As with BSCP502 (3.2.3.7) I would prefer it made clearer that when de-appointing an MPAN the timeline should state that it is SSD of the new appointment. I assume this is up to and including the date of SSD, i.e. not SSD -1D	Updated wording to By New Supplier SSD
BSCP514 5.2.4.4	As above comments on SSD	Updated wording to By New Supplier SSD
BSCP514 5.2.4.4, 5.2.7.4, 6.2.4.4, 6.2.5.4	Not clear the context of "By SSD". Is this by the SSD of the new supplier? In the context of the 'old supplier' this is the end of current Supplier appointment. Should be clarified	Updated wording to By New Supplier SSD

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Comments on the CP1532 Proposed Redlining		
Document & Location	Comment	ELEXON's Response
BSCP514 5.2.7.5	<p>Not clear of the trigger being all D0011s, if one agent does not respond then the step will stall indefinitely. This fundamentally changes this step.</p> <p>There is no mention in this step of the D0261 rejection of appointment. It would assist if the BSCP put a timeframe on the Supplier to react and resolve any D0261 rejections</p>	We consider this to be outside of the scope of this CP as it is part of the existing process.

8 Recommendations

We invite the **SVG** to:

- **AGREE** the amendments to the proposed redlining for BSCP502, BSCP504 and BSCP514 for CP1532 made following the CP Consultation;
- **APPROVE** the proposed changes to BSCP502, BSCP504 and BSCP514 for CP1532; and
- **APPROVE** CP1532 for implementation on 24 February 2022 as part of the February 2022 BSC Release; and
- **NOTE** that:
 - The Implementation Date has been extended from 25 February 2021 in response to consultation responses.

Appendix 1: Glossary & References

Acronyms

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

Acronyms	
Acronym	Definition
BSCP	Balancing and Settlement Code Procedure
CoA	Change Of Agent
CoS	Change of Supplier
CP	Change Proposal
CSS	Central Switching Service
DA	Data Aggregator
DC	Data Collector
EFR	Error and Failure Resolution
HH	Half Hourly
MOA	Meter Operator
NHH	Non Half Hourly
NHHDC	Non Half Hourly Data Collector
RCC	Retail Code Consolidation
REC	Retail energy Code
SCR	Significant Code Review
SF	Initial Settlement Run
SVG	Supplier Volume Allocation Group
WD	Working Days

DTC data flows and data items

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

DTC Data Flows and Data Items	
Number	Name
D0011	Agreement of Contractual Terms
D0148	Notification of Change to Other Parties
D0151	Termination of Appointment or Contract by Supplier
D0155	Notification of Meter Operator or Data Collector Appointment and Terms
D0170	Request for Metering System Related Details
D0268	Half Hourly Meter Technical Details
D0289	Notification of MC/EAC/PC
D0302	Notification of Customer Details

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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	Ofgem Switching Programme	https://www.ofgem.gov.uk/electricity/retail-market/market-review-and-reform/smarter-markets-programme/switching-programme
2	CP1405	https://www.elexon.co.uk/change-proposal/cp1405/
2	BSCP502	https://www.elexon.co.uk/documents/bsc-codes/bscps/bscp502/
2	BSCP504	https://www.elexon.co.uk/documents/bsc-codes/bscps/bscp504/
2	BSCP514	https://www.elexon.co.uk/documents/bsc-codes/bscps/bscp514-2/
3	Retail Energy Code	https://www.ofgem.gov.uk/licences-industry-codes-and-standards/industry-codes/electricity-codes/retail-energy-code-rec
3	Central Switching Service	https://www.ofgem.gov.uk/publications-and-updates/uk-link-and-proposed-central-switching-service
3	RCC SCR	https://www.ofgem.gov.uk/publications-and-updates/retail-code-consolidation-scr-launch-statement
3	Switching SCR	https://www.ofgem.gov.uk/publications-and-updates/switching-significant-code-review-launch-statement-and-request-expressions-interest-participate-programme-workgroups
3	BSC Panel	https://www.elexon.co.uk/group/the-panel/
3	Issue 86	https://www.elexon.co.uk/smg-issue/issue-86/
5	DTC Flows	https://dtc.mrasco.com/ListDataFlows.aspx
7	ELEXON Releases	https://www.elexon.co.uk/change/releases/the-release-and-implementation-process/
7	SVG 229	https://www.elexon.co.uk/meeting/svg229/
8	ELEXON Newscasts	https://www.elexon.co.uk/news-events/newscasts/
9	Switching Programme Delay	https://www.ofgem.gov.uk/publications-and-updates/ofgem-information-energy-licensees-coronavirus-covid-19-response

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