MEETING NAME Performance Assurance Board

Date of meeting 26 February 2020

Paper number 229/05

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Purpose of paper For Decision

Classification Public

Summary This paper presents the Risk Evaluation Register for the 2020/21 Performance

Assurance Operating Period (PAOP) for the PAB's approval prior to issuing to

stakeholders for comment.

Unless otherwise stated; ELEXON have utilised the Risk Evaluation Methodology (REM) and data sources as set out in the REM 2019/20. For reference the 2019/20 Risk Evaluation Register (RER) Risk assessments are noted in the Appendix of this Paper. ELEXON has been undertaking data validation of the Risk assessments for the RER 2020/21. Due to the thorough nature of data validation and the number of scripts being validated; this meant that ELEXON was not able to present the RER to the PAB in January 2020, as advised in the Annual Performance Assurance Timetable (APAT).

1. Risk 1 – Registration

- 1.1 ELEXON has included an additional risk factor for Risk 1 to recognise the importance of retrieving all registration data from all parties, including those in the Supplier Hub and the Licenced Distribution System Operators (LDSO's).
- 1.2 ELEXON is conducting a review of the assessment procedure against this risk. ELEXON will make improvements and provide a refined risk assessment via the within period revision process, to be delivered in the first quarter of 2020/21.
- 1.3 ELEXON has received no further information to warrant changing its assessment or assumptions from the 2019/20 PAOP.

2. Risk 2 – Attributes

- 2.1 ELEXON has updated the assessment procedure for Risk 2 in order to provide a more representative materiality, by taking into account the proportion of Meter Exchanges (MEX) being undertaken each year.
- 2.2 ELEXON has forecasted a 52% decrease in the Materiality of Risk 2 for 2020/21.

3. Risk 3 – Metering Equipment installation, programming, maintenance and Commissioning

- 3.1 ELEXON is working to improve the Technical Assurance of Metering Performance Assurance Technique.

 These improvements have been discussed and presented to the PAB at its February 2019 meeting (PAB217).

 ELEXON believes this improvement will reduce the number of days impacted by failure of processes, relating to this risk.
- 3.2 ELEXON has forecasted a 5% increase in the Materiality of Risk 3.

4. Risk 4 – Notification of Change to Metering Equipment

4.1 ELEXON has recorded a consistent number of Meter Exchange events in 2019/20, compared to previous years. The increase in MEX events forecasted in the RER 2019/20, due to SMART Meter replacements, did



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- not materialise. ELEXON however reported a 20% increase in the time taken to notify any changes to Metering Equipment.
- 4.2 ELEXON notes the additional controls on MEX events through Technical Assurance of Performance Assurance Parties (TAPAP) audits. BSC Audit and monitoring through Error and Failure Resolution (EFR) has contributed to significant reductions in failure rates against Risk 4.
- 4.3 ELEXON has forecasted a 25% decrease in the Materiality of Risk 4. This decrease is primarily the result of a decrease in average system prices and failure rates. However, our latest estimate for average error per day has also decreased, which has further contributed to the decrease in estimated materiality.

5. Risk 5 – Fault Resolution (Focused Risk 2019/20)

- 5.1 ELEXON notes the industry has been working proactively and collaboratively to reduce issues surrounding communications and interoperability. ELEXON has noted a 6% reduction in the number of faults occurring, although a 40% increase in the days impacted by faults. ELEXON notes the conclusion of Issue73 will allow efficiencies to be implemented into the fault resolution process.
- 5.2 ELEXON has forecasted a 17% decrease in the Materiality of Risk 5.

6. Risk 6 – Meter Technical Details Transfer and Processing

- 6.1 BSC Parties that had been identified in the 2017/18 P283 Meter Technical Details (MTD's) TAPAP are achieving milestones in their EFR Plans. ELEXON notes continual improvements in the processes relating to the Risk, will reduce the impact to parties.
- 6.2 ELEXON has forecasted a 65% reduction in the Materiality of Risk 6 for the 2020/21 PAOP.

7. Risk 7 – Retrieval of Metered Data

- 7.1 ELEXON has aggregated Measurement Classes (MC) E, F, and G into one 'Sub-100kW' market in its forecast for 2020/21.
- 7.2 ELEXON observed a general trend of 3.6% decreasing consumption in Non Half-Hourly (NHH), whereas only a slight 0.13% reduction in the Half-Hourly (HH) Markets has been observed. The forecasted industry failure rate for 2019/20 looks to be within the ranges provided for NHH and HH. ELEXON notes the market has performed better than forecasted in the Sub 100kW area.
- 7.3 ELEXON has forecasted a 37% reduction in the materiality of Risk 7.

8. Risk 8 – Processing of Metered Data

- 8.1 ELEXON has delivered all Large Estimated Annual Consumption (EAC)/Actual Advance (AA) backlogs to Parties, and are providing training and support to further reduce the impact of Large EAC/AAs on Risk 8. ELEXON has closed one HH dispute related to Risk 8 in 2019/20 with a minor Materiality, this has led to a more representative forecast of HH Metered Data Processing Error in 2020/21. ELEXON has closed nine NHH disputes related to Risk 8 in 2019/20.
- 8.2 This has led to a 26% decrease in the forecasted materiality for Risk 8 in 2020/21.

9. Risk 9 Data Aggregator Processing

9.1 ELEXON has added an additional risk factor to Risk 9 to reflect Data Aggregator (DA) involvement with Virtual Lead Party (VLP) processes, and the role the DA takes in preventing missing or erroneous data from entering Settlement. The risk factor states: 'The DA does not accurately process or provide timely energy volumes against Asset Metering System Identifier (AMSID) to the Supplier Volume Allocation Agent (SVAA)'.

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- 9.2 ELEXON reported a 230% increase in the number of defaulted Settlement Runs. ELEXON processed fewer Trading Disputes relating to defaulted runs than in previous years, although the Materiality of these disputes were lower than that of previous disputes.
- 9.3 The combination of these factors has led to ELEXONs forecasted assessment of Risk 9 to be a 95% reduction of the forecasted materiality from the 2019/20 PAOP.

10. Risk 10 - Meter Read History

- 10.1 ELEXON has revised the assessment of the proportion of the market which could be affected by Risk 10, this will elicit a much more representative assessment of the risk. ELEXON has reported a deterioration in the performance of parties against Performance Assurance Reporting and Monitoring System (PARMS) Serial NC11. ELEXON has also recorded an ongoing reduction to the days impacted by Risk 10, with a 12% decrease in the last year.
- 10.2 The overall forecasted Materiality for Risk 10 shows a 29% reduction from the 2019/20 PAOP.

11. Risk 11 – Unmetered Supplies (UMS)

- 11.1 Volumes of both HH and NHH UMS energy have decreased by 6% since the initial scoring of Risk 11. This can be attributed to improvements in energy efficiency, such as more energy efficient UMS equipment and increased adoption of Central Management Systems (CMS) for controlling street lighting. ELEXON has reported parties have an improved understanding of the Material Error Monitoring (MEM) data and how to quantify 'error' more accurately.
- 11.2 ELEXON has forecasted a 56% decrease materiality attributed to Risk 11.

12. Risk 12 – Metering Equipment Technical Details Quality

- 12.1 ELEXON is conducting a review of the assessment procedure against this risk. ELEXON will make improvements and provide a refined risk assessment via the within period revision process, to be delivered in the first quarter of 2020/21.
- 12.2 ELEXON has received no further information to warrant changing its assessment or assumptions from the 2019/20 PAOP.

13. Risk 13 – Manual Adjustments

13.1 ELEXON has received no further information to warrant changing its assessment or assumptions from the 2019/20 PAOP.

14. Risk 14 - Agent Appointments

14.1 ELEXON has updated its assessment of Risk 14 with the latest market information, which has led to a 4% increase in the forecasted materiality for 2020/21.

15. Risk 15 - Reference Data

- 15.1 ELEXON is in the process of creating a Line Loss Factor (LLF) Audit Issue and Market Domain Data (MDD) Issue Tracker where this data will contribute to the forecast of the Materiality for Risk 15. This process will take place once the LLF Audit has been completed. Following this, the risk will be re-assessed taking into account more noted controls, in order to have more representative analysis.
- 15.2 ELEXON will also create a work paper for the BSC Audit where the terms will be in line with LLF Audit for Risk 15 after finalising the total volume of the materiality.



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15.3 Currently ELEXON is in the stage of automating the manual processes by implementing a new system for LLF submissions in order to control the validations and to help reduce the level of error.

16. Risk 16 – Energisation Status

- 16.1 ELEXON is using Material Error Monitoring (MEM) technique to monitor incorrect Energisation Status and report information to the industry. However, the MEM technique only includes NHH data. Additionally, queries used for to extract NHH data requires a revised structure in order to make sure that the retrieved data is accurate.
- 16.2 ELEXON has forecasted a 3% reduction in the forecasted Materiality for Risk 16.

17. Risk 17 – Exception Report

17.1 ELEXON has received no further information to warrant changing its assessment or assumptions from the 2019/20 PAOP.

18. Risk 18 – Revenue Protection

- 18.1 ELEXON has received no information to warrant changing its assessment or assumptions from the 2019/20 PAOP.
- 18.2 ELEXON has further liaised with Electralink and the Theft Risk Assessment Service (TRAS) and is expecting to receive requested sample data in March 2020. ELEXON will then produce a prototype Revenue Protection Reconciliation Report for approval, prior to establishing regular data receipt from Electralink in the 2020/21 PAOP.

19. Risk 19 - Registration

- 19.1 ELEXON has updated the assessment procedure of Risk 19 to more accurately represent the registration and deregistration activity undertaken across each PAOP.
- 19.2 Trading disputes continue to be raised against Risk 19 relating to the non-registration of sites, ELEXON has noted the disputes are impacting 175% more days than forecast in the RER 2019/20. ELEXON also recorded a number of near misses in the 2019/20 PAOP. ELEXON assessed the impact of the disputes raised against Risk 19 and identified that the error per day has increased by 380%.
- 19.3 ELEXON has forecasted a 773% increased materiality against from Risk 19 in the upcoming PAOP.

20. Risk 20 - Metering Equipment Installation, Programming, Maintenance and Commissioning

- 20.1 ELEXON has implemented a post-energisation and registration transfer check procedure with the processes associated with Risk 20. ELEXON has forecasted a more representative number of Volume Allocation Units that is 6% below that for the forecast for 2019/20. ELEXON has also forecasted a 56% reduction in the days impacted and a 36% reduction in the error per day relating to Risk 20.
- 20.2 These refinements have led to a 93% reduction in the Materiality of Risk 20.

21. Risk 21 – Retrieval and Processing of Metered Data

- 21.1 ELEXON has reported a 251% increase in error per day relating to Balancing Mechanism Units (BMUs), compounded by a 4% increase in the number of estimating periods against Grid Supply Points (GSPs) and BMUs, than had been observed previously.
- 21.2 The combination of these factors has led to the forecasted Materiality increasing by 90%.



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22. Combination of Risk 22 and 24

- 22.1 Risk 22 Changes to Central Volume Allocation (CVA) Metering Equipment are not notified to Central Data Collection Agent (CDCA).
- 22.2 Risk 24 CVA Metering System technical details are created incorrectly.
- 22.3 ELEXON have reviewed Risk 22 and Risk 24 and have determined that they should be managed and evaluated as one. The risks had previously been evaluated separately as the roles, processes, and root causes relating to the provision of correct and the creation of accurate MTDs are distinct from one another.
- 22.4 The assessment of Risk 22 and 24 relies solely on a shared data source, the Technical Assurance of Metering (TAM) Audit. To determine which Risk an identified TAM non-compliance is related to, is resource intensive and requires manual interrogation into the detailed Audit findings. The TAM Audit identifies very few non-compliances relating to Risk 22 and 24 each year; so few, that ELEXON cannot extract statistically significant forecasts for Risk assessment.
- 22.5 ELEXON have renamed the risk to represent the combination of both risks:
 - CVA Metering System technical details are not created or notified correctly
- 22.6 ELEXON notes risk factors 1 and 2 of Risk 024 are:
 - 1 Technical Details incorrectly recorded or transferred by on-site engineer (CVA Meter Operator Agent, Licenced Distribution System Operator or a third party)
 - 2 Manual transfer of forms from CVA MOA to the CDCA and Registrant

Which complement the risk factor of Risk 22:

- 1 Registrant, CVA MOA or Equipment Owner (e.g. Measurement Transformers) actions not notified
- 22.7 ELEXON have inserted the risk factors of Risk 24 into Risk 22; alongside all Risk information associated with Risk 24.
- 22.8 ELEXON have assessed the materiality of the newly combined risk as £1.8m.

23. Risk 23 - Fault Resolution

- 23.1 The Risk title has been updated for the 2020/21 PAOP, the title now more accurately reflects the risk to settlement posed in Risk 23. The title is now: 'A fault with CVA Metering Equipment causes metered data to be recorded incorrectly or cannot be retrieved'.
- 23.2 ELEXON is working with the CGI to implement improvements to the Fault Log, a vital data source for the assessment of Risk 23. ELEXON carried out a data cleansing exercise of the existing fault log which led to a more representative assessment of Risk 23. ELEXON has forecasted a 50% increase in the number of Initial Settlement Final (SF) impacting faults that will arise in 2020/21, alongside a 15% increase in the days impacted by faults, compared to the forecast for the previous PAOP.
- 23.3 ELEXON have forecasted a 21% increase to the Materiality of Risk 23.

24. Risk 24 – Reference Data

- 24.1 ELEXON have updated the Risk Number for Reference Data from Risk 25 in 2019/20 to Risk 24, this is due to the combination of Risk 22 and 24 into Risk 22.
- 24.2 ELEXON notes Line Loss Factors (LLF) are audited before they are used in Settlement and errors are corrected. Therefore the likelihood of an error entering Settlement is very low. This year ELEXON have seen



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- one Trading Dispute relating to Transmission Loss Factors (TLF) where the TLFs for four BM Units were incorrect over one season.
- 24.3 A Market Index Data Provider incorrectly calculated Market Index Data (Market Index Price and Market Index Volume) between 24 and 31 March 2019. The incorrect calculation was due to an error in the system with the spring clock change shifting Market Index Data by an hour.
- 24.4 ELEXON has updated the assessment procedure of Risk 24. The update has provided a representative assessment of the material impact of Risk 24.
- 24.5 ELEXON has reported a 77% decrease in the Materiality attributed to Risk 24 due to the factors above.

25. Risk 25 – Virtual Lead Parties

- 25.1 ELEXON has developed a Risk specifically associated with the processes operated by Virtual Lead Parties (VLP's), in preparation for their inclusion into the Market. The risk factors outline the three processes that could lead to missing or erroneous data entering Settlement, and the controls noting the initial processes by which error should be limited.
- 25.2 ELEXON has proposed to conduct market monitoring to understand the energy volumes, exception reporting, and teething issues that may arise as the VLP Market establishes. Market monitoring will allow ELEXON to more representatively assess the Risk posed to Settlement by VLP's as the market develops.
- 25.3 ELEXON has proposed an initial risk assessment matrix for the evaluation of Risk 25, which provides standard figures, to be used selectively when market monitoring confirms milestones have been met. ELEXON is proposing to use this matrix until market monitoring lends itself to the development of a reflective evaluation methodology taking into account the Risk Factors as set out in Risk 25.

26. Risk 26 - Aggregation Rules

- 26.1 ELEXON is conducting a review of the assessment procedure against this risk. ELEXON will make improvements and provide a refined risk assessment via the within period revision process, to be delivered in the first quarter of 2020/21.
- 26.2 There have been no issues relating to this risk in the last PAOP. Therefore ELEXON does not believe that there is anything warrant changing its assessment or assumptions from the 2019/20 PAOP.

27. Risk 27 – Payment Default

- 27.1 BSC Modification <u>P385</u> will be implemented on 27 February 2020, which brings changes to the Events of Default in BSC Section H. The changes will enable the BSC Panel to act quicker when a Supplier fails, helping to reduce the costs to other BSC Parties through Default Funding Shares.
- 27.2 Risk 27 was originally scored looking at the number of Parties which had/could fail within a PAOP. ELEXON have instead looked at the proportion of the market which has failed, rather than a count of failed supplier/suppliers which could fail. ELEXON believe this better assesses the potential materiality of the risk. The methodology used to assess the materiality of Risk 27 has therefore changed in line with this.
- 27.3 ELEXON notes that there were a high number of failing suppliers and percentage of market share failing in 2018/19 compared to other years. However, it also recognises that market conditions remain challenging for suppliers and therefore this may not be an outlier and should be reflected in our scoring.
- 27.4 ELEXON has forecasted a 155% increase to the materiality associated with Risk 27.

28. Risk 28 – NETSO Submission



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- 28.1 ELEXON is conducting a review of the assessment procedure against this risk. ELEXON will make improvements and provide a refined risk assessment via the within period revision process, to be delivered in the first quarter of 2020/21.
- 28.2 ELEXON has received no further information to warrant changing its assessment or assumptions from the 2019/20 PAOP.

29. Risk 29 – SAA Calculations

29.1 ELEXON have reviewed Risk 29 and concluded that the current RER score remains appropriate. The materiality for this risk therefore remains based on a known rounding issue in Settlement Administration Agent (SAA).

30. Risk 30 – ECVAA Processes

- 30.1 ELEXON is conducting a review of the assessment procedure against this risk. ELEXON will make improvements and provide a refined risk assessment via the within period revision process, to be delivered in the first quarter of 2020/21.
- 30.2 ELEXON has received no further information to warrant changing its assessment or assumptions from the 2019/20 PAOP.

31. Risk 31 – Funds Administration Agent (FAA) Processes

- 31.1 ELEXON have reviewed Risk 31 and believe the materiality has not changed.
- 31.2 The methodology from the original RER to score Risk 31 is based on a theoretical percentage error by the FAA when calculating Trading Charges for BSC Parties for a significantly high Imbalance Cashflow day within the PAOP.

32. Risk 32 – CVA Manual Adjustments

- 32.1 ELEXON is conducting a review of the assessment procedure against this risk. ELEXON will make improvements and provide a refined risk assessment via the within period revision process, to be delivered in the first quarter of 2020/21.
- 32.2 ELEXON has received no further information to warrant changing its assessment or assumptions from the 2019/20 PAOP.

33. Risk 33 - Metered Volumes for Interconnector Users

- 33.1 Two factors have led to the change in materiality seen from the 2019/20 RER. ELEXON have corrected an error in the initial evaluation Methodology, which has increased the impact of the days affected by any Interconnector Deemed Metered Volumes (IDMV) in the materiality calculations. This correction would have seen the low materiality remain the same for Risk 33 in 2018/19, but the middle and upper materiality' would have been significantly lower.
- 33.2 The 2018/19 RER projected two additional interconnectors for GB to go live in 2019. Nemo Link has been operational since 31 January 2019, whilst Electralink is now expected to be operational in 2020. This has been factored into the assessment of Risk 33 for 2020/21.
- 33.3 These adjustments have led to a 14% decrease in the total materiality forecast for 2020/21 against the corrected materiality from the previous PAOP.

34. Risk 34 – SVAA Data Processing



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- 34.1 ELEXON is conducting a review of the assessment procedure against this risk. ELEXON will make improvements and provide a refined risk assessment via the within period revision process, to be delivered in the first quarter of 2020/21.
- 34.2 ELEXON has received no further information to warrant changing its assessment or assumptions from the 2019/20 PAOP.

35. Recommendations

- 35.1 We invite you to:
 - a) **ENDORSE** the draft RER 2020/21; and
 - b) AGREE to publish the draft RER for consultation

APPENDICES

Appendix 1 – RER 2019/20 Risk Assessment Detail

Risk 1 - Registration

Scoring for 2019/20

Lower Impact	Impact	Upper Impact
£1.4m	£5.9m	£22.6m

Risk 2 - Attributes

Scoring for 2019/20

Lower Impact	Impact	Upper Impact
£270.4k	£738.9k	£1.4m

Risk 3 – Metering Equipment installation, programming, maintenance and Commissioning

Scoring for 2019/20

Lower Impact	Impact	Upper Impact
£14.7m	£43.0m	£84.3m

Risk 4 - Notification of Change to Metering Equipment



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Scoring for 2019/20

Lower Impact	Impact	Upper Impact
£2.9m	£7.7m	£19.4m

Risk 5 – Fault Resolution

Scoring for 2019/20

Lower Impact	Impact	Upper Impact
£19.6m	£35.8m	£62.2m

Risk 6 - Meter Technical Details Transfer and Processing

Scoring for 2019/20

Lower Impact	Impact	Upper Impact
£3.5m	£8.0m	£17.0m

Risk 7 - Retrieval of Metered Data

Scoring for 2019/20

Lower Impact	Impact	Upper Impact
£9.3m	£26.8m	£56.0m

Risk 8 – Processing of Metered Data

Scoring for 2019/20

Lower Impact	Impact	Upper Impact
£4.1m	£7.4m	£22.6m

Risk 9 – Data Aggregator Processing

Scoring for 2019/20

Lower Impact	Impact	Upper Impact
£500.0k	£3.0m	£6.6m

Risk 10 - Meter Read History

Scoring for 2019/20



Lower Impact	Impact	Upper Impact
£700.0k	£2.7m	£7.8m

Risk 11 – Unmetered Supplies

Scoring for 2019/20

Lower Impact	Impact	Upper Impact
£9.8m	£17.6m	£30.4m

Risk 12 – Metering Equipment Technical Detail Quality

Scoring for 2019/20

Lower Impact	Impact	Upper Impact
£2.1m	£6.2m	£17.1m

Risk 13 – Manual Adjustments

Scoring for 2019/20

Lower Impact	Impact	Upper Impact
£8.7m	£14.2m	£23.4m

Risk 14 – Agent Appointments

Scoring for 2019/20

Lower Impact	Impact	Upper Impact
£1.3m	£3.0m	£5.9m

Risk 15 - Reference Data

Scoring for 2019/20

Lower Impact	Impact	Upper Impact

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£0.0k	£590.6k	£5.5m

Risk 16 - Energisation Status

Scoring for 2019/20

Lower Impact	Impact	Upper Impact
£1.6m	£15.1m	£39.6m

Risk 17 – Exception Management

Scoring for 2019/20

Lower Impact	Impact	Upper Impact
£0.0k	£200.0k	£20.1m

Risk 18 – Revenue Protection

Scoring for 2019/20

Lower Impact	Impact	Upper Impact
£1.7m	£4.3m	£10.1m

Risk 19 – Registration

Scoring for 2019/20

Lower Impact	Impact	Upper Impact
£0.0k	£483.0k	£2.4m

Risk 20 - Metering Equipment installation, programming, maintenance and Commissioning

Scoring for 2019/20

Lower Impact Impact Upper Impact	
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£618.0k	£14.0m	£21.2m

Risk 21 - Retrieval and processing of metered data

Scoring for 2019/20

Lower Impact	Impact	Upper Impact
£18.6m	£31.1m	£48.5m

Risk 23 - Fault Resolution

Scoring for 2019/20

Lower Impact	Impact	Upper Impact
£14.3m	£30.2m	£56.7m

Risk 24 - Technical Details Quality

Scoring for 2019/20

Lower Impact	Impact	Upper Impact
£150.0k	£1.1m	£4.0m

Risk 25 – Reference data

Scoring for 2019/20

Lower Impact	Impact	Upper Impact
£0.0k	£420.0k	£888.0k

Risk 26 – Aggregation Rules

Scoring for 2019/20

Lower Impact	Impact	Upper Impact
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£0.0k	£107.4k	£39.8m

Risk 27 – Payment Default

Scoring for 2019/20

Lower Impact	Impact	Upper Impact
£0.0k	£440.0k	£2.1m

Risk 28 - NETSO Submissions

Scoring for 2019/20

Lower Impact	Impact	Upper Impact
£393.7k	£1.1m	£2.5m

Risk 29 – SAA Calculations

Scoring for 2019/20

Lower Impact	Impact	Upper Impact
£0.0k	£508.0k	£750.0k

Risk 30 – ECVAA Processes

Scoring for 2019/20

Lower Impact	Impact	Upper Impact
£631.5k	£2.1m	£4.2m

Risk 31 - FAA Processes

Scoring for 2019/20



Lower Impact	Impact	Upper Impact
£0.0k	£58.2k	£116.4k

Risk 32 – Manual Adjustments

Scoring for 2019/20

Lower Impact	Impact	Upper Impact
£347.0k	£1.5m	£12.5m

Risk 33 - Metered Volumes for Interconnector Users

Scoring for 2019/20

Lower Impact	Impact	Upper Impact
£21.6m	£286.8k	£1.6m

Risk 34 – SVAA Data Processing

Scoring for 2019/20

Lower Impact	Impact	Upper Impact
£0.0k	£179.9k	£8.4m

Attachments

Attachment A - Risk Evaluation Register 2020/21 v1.0

Attachment B - Risk Evaluation Register 2020/21 consultation questions v1.0

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