

## P408 'Simplifying the Output Usable Data Process as a consequence of GC0130'

This Modification seeks to modify Section Q of the BSC to reflect the Grid Code changes required from [Grid Code \(GC\) Modification GC0130 'OC2 Change for simplifying 'output useable' data submission and utilising REMIT data'](#). This Modification will remove the obligations on National Grid Electricity System Operator (NGESO) to publish data that is no longer mandated to be published by the Grid Code and add obligations to publish the new data. It will also simplify the obligations around the existing data.



ELEXON recommends P408 is progressed directly to the Report Phase with an initial recommendation to approve

This Modification is expected to impact:

- Generators
- NGESO
- Balancing Mechanism Reporting System (BMRS) Users
- Balancing Mechanism Reporting Agent (BMRA)



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## About This Document

This document is an Initial Written Assessment (IWA), which ELEXON will present to the Panel on 14 May 2020. The Panel will consider the recommendations and agree how to progress P408.

There are three parts to this document:

- This is the main document. It provides details of the Modification Proposal, an assessment of the potential impacts and a recommendation of how the Modification should progress, including the Workgroup's proposed membership and Terms of Reference.
- Attachment A contains the P408 Proposal Form.
- Attachments B contains the proposed legal text.

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# 1 Summary

## What is the issue?

Grid Code Modification GC0130: "OC2 Change for simplifying 'output useable' data submission and utilising REMIT data" seeks to simplify the process for Generators to submit outage information 'Output Useable' to NGESO, and to reduce the need for data to be entered into more than one system. This data is currently published on the BMRS. Consequently, the BSC will need to be updated to align with GC0130.

CG0130 will remove the need for NGESO to send certain Output Useable data to the BMRA, whilst requiring new data to be sent. The existing BSC requirements are also overly complex and should be simplified.

The modification aims to deliver:

- Continued alignment of the Grid Code and BSC processes; and
- Improved market transparency and efficiency through provision of additional Output Usable, Margin and Surplus data in the two to three year ahead timescale.

## What is the proposed solution?

To update BSC Section Q and X-2 in order to ensure BSC alignment to the Grid Code following the implementation of GC0130. An update to BMRS will also be required.

## Impacts and costs

P408 is expected to impact BMRS Users, Generators and NGESO. ELEXON will also be required to update BMRS and implement the BSC document changes. The central implementation costs will be approximately £149k and require 17 weeks to implement, driven by the BMRS changes.

## Implementation

The next available BSC Release we can implement P408 in is on 25 February 2021, as part of the BSC February 2021 Release.

## Recommendation

This Modification is recommended to be progressed straight to Report Phase as a Self-Governance Modification Proposal.

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### National Output Usable

NGESO receive data from individual generators to aggregate and provide data on total generation availability

### What is the issue?

Grid Code Modification GC0130 'OC2 Change for simplifying 'output useable' data submission and utilising REMIT data' seeks to simplify the process for Generators to submit outage information to NGESO, and to reduce the need for data to be entered into more than one system. This data is used by NGESO to calculate National Output Usable, as well as margin and surplus data. This data is sent by NGESO to ELEXON, for publication on the BMRS as required by Section Q of the BSC.

P408 is being raised to ensure continuing alignment of Grid Code and BSC processes. P408 is being driven by Grid Code Modification GC0130, which itself is driven by a requirement from NGESO to decommission an obsolete IT system, and by a desire from the industry to simplify an overly complex and burdensome process, removing unnecessary duplication of effort.

If GC0130 is approved, but this Modification is not made, then NGESO will be required to publish data under the BSC code that they do not have, and that they would have no rights under the Grid Code to obtain.

### Background

The current process, defined in [Grid Code OC2](#), is highly complex, with different data for different time frames being supplied by generators at different times of the year and on different days of the week. Data is currently submitted to NGESO through a web based application called TOGA (Transmission Outage and Generator Availability). This is now obsolete and NGESO are looking to decommission the system and the Generator availability function will be replaced by a new system called electricity Generator Availability & Margin Analysis (eGAMA)

Once NGESO have received the data from individual Generators, they aggregate the data and provide data on total generation availability ("Output Usable") to the BMRA, along with generation margin and surplus as well as Output Usable by fuel type and by Balancing Mechanism (BM) Unit. The data is provided for 2-14 days ahead at daily resolution and for 2-52 weeks ahead at weekly resolution. NGESO also send Output Usable data for up to five years ahead to the BMRA twice a year. Output Usable is currently provided at both a national level and broken down by constraint zones.

In addition to the TOGA process, which runs every working day, Generators are also required by the [EU Regulation on Energy Market Integrity and Transparency \(No 1227/2011\)](#) (REMIT) to submit similar outage data to the [European Network of Transmission System Operators for Electricity \(ENTSO-E\)](#).

Most GB Generators covered by the REMIT regulations use ELEXON's REMIT platform to submit the data to ENTSO-E. There are some Generators and Interconnectors who use alternative methods to submit the data, and some smaller Generators that are required to provide data to NGESO under OC2 are not required to provide data under REMIT.

It should be noted that while GC0130 discusses the use of TOGA, the OC2 legal text only places obligations on the provision of data and not the delivery method.

Under the current process, the Grid Code requires NGESO to provide Generators with the Output Usable, margin and surplus data, and the BSC requires NGESO to publish to the

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market the same data that they send to Generators. Both codes have separate obligations relating to each timescale.

Under the GC0130 proposal, there will be a single requirement in the Grid Code for NGENSO to publish Output Usable (including by fuel type and BM unit), margins and surpluses daily to the BMRA. The data will be sent for just two timescales, 2-14 days ahead at daily resolution and 2 weeks to 156 weeks (three years) ahead at weekly resolution.

## Benefits

This Modification is a necessary consequence of Grid Code Modification GC0130. Taken together these modifications improve efficiency by removing the need for most Generators to enter outage data into two separate systems (REMIT and TOGA).

The TOGA system is obsolete and needs to be replaced. These Modifications offer a route whereby most Generators will not need to develop IT systems to interface with EGAMA (the TOGA replacement system), providing a saving to Generators. Creating a new, automated TOGA replacement system also provides a cost saving to NGENSO.

The provision of additional data for two and three years ahead, and the increased frequency of updating the data improves market transparency and efficiency.



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### Grid Code 0130 Modification

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GC0130 states that the Zonal Output Usable process is out of date and no longer used, and also states that data beyond 3 years ahead is very inaccurate and therefore not adding value.

Consequently, GC0130 proposes the decommissioning of both of these processes.

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### Proposed solution

P408 proposes to update the BSC and relevant systems and documents in order to ensure BSC alignment to the Grid Code following the implementation of GC0130.

### Changes to BSC

P408 will modify Section Q 6.1 of the BSC to align the obligations with those in the Grid Code. Specifically:

1. Remove references to Zonal Output Usable from 6.1.1
2. Move references to Surplus and Margin from 6.1.2 to 6.1.2A. This is because 6.1.2 refers to publication of Demand Forecast which are governed by Grid Code OC1 which is not being changed by GC0130, and so publication of demand forecasts will remain at weekly frequency, while publication of Surplus and Margin are governed by OC2 and so are moving to daily frequency. Paragraph 6.1.2 now relates to publication of data in OC1, and paragraph 6.1.2A covers publication of data from OC2. Also simplify language in 6.1.2 to be the same as 6.1.2A. This paragraph relating to 2 to 52 weeks is retained in order to minimise impact on the BMRS. The BMRS Change Board have stated that they wish to retain the existing 2-52 week screens, and so the current 2-52 week data flows will be maintained in parallel with the 2 week to 3 Year Ahead data flow specified by GC0130.
3. Change the frequency of publication in 6.1.2A from 1700 hours on the last Business Day of the week to at least daily (up to hourly) by 1600 hours each day, to align with Grid Code. Add Surplus and Margin as noted above. Delete references to Zonal Output Usable
4. Delete 6.1.2B as this relates to a 2-49 Day Ahead process not run by NGENSO for many years.
5. Combine 6.1.4 and 6.1.4A to cover 2-14 Day Ahead for Output Usable, including by Fuel Type and by BM Unit, Margin and Surplus. Set frequency to at least once a day (by 1600) and up to once an hour.
6. Mark 6.1.4A as Not Used
7. Modify 6.1.4B to refer to 2 to 156 Week Ahead rather than 1 to 2 year ahead and 3 to 5 year ahead. Remove references to Zonal Output Usable and add references to Output Usable by Fuel Type and by BM Unit, Margin and Surplus. Change frequency from not less than twice each calendar year to at least once a day (by 1600) and up to once an hour.

Delete the definition of Zonal Output Usable from Section X-2.

### Changes to BMRS

Changes will be required to the BMRS to reflect the changes in the data supplied from NGENSO.

The table below shows the data flows that are impacted by GC0130. In summary, the data is simplified so that all five sets of data (Output Usable, margin, surplus, Output Usable by fuel type and Output Usable by BMU) will all be sent every day for both 2-14

days at daily resolution, and 2 weeks to 156 weeks (three years) ahead at weekly resolution. Zonal Output Usable, will no longer be sent.

	2-14 Day	2-49 Day	2-52 Week	Year 1	Year 2	Year 3	Year 4	Year 5	2-156 Weeks
National Output Usable	Unchanged	Already Obsolete	Unchanged	Delete	Delete	Delete	Delete	Delete	New
	NOU2T14D	NOU2T49D	NOU2T52W	NOUY1	NOUY2	NOUY3	NOUY4	NOUY5	NOU2T3YW
Zonal Output Usable	Delete	Already Obsolete	Delete	Delete	Delete	Delete	Delete	Delete	
	ZOU2T14D	ZOU2T29D	ZOU2T52W	ZOUY1	ZOUY2	ZOUY3	ZOUY4	ZOUY5	
National Surplus	Unchanged		Unchanged						New
	OCNMFD		OCNMFV						OCNMF3Y
National Margin	Unchanged		Unchanged						New
	OCNMF2		OCNMF2						OCNMF3Y2
Output Usable by Fuel Type	Unchanged		Unchanged						New
	FOU2T14D		FOU2T52W						FOU2T3YW
Output Usable by BMU & Fuel Type	Unchanged		Unchanged						New
	UOU2T14D		UOU2T52W						UOU2T3YW
National Demand	Unchanged		Unchanged						
	NDFD		NDFW						
Transmission System Demand	Unchanged		Unchanged						
	TSDFD		TSDFW						

The existing 2-52 week files will continue to be sent by NGENSO, in order to have minimum impact on the BMRS. In addition five new files will be sent covering 2-156 weeks. Each file will be in the same format as the corresponding 2-52 week file.

The following changes will be made to individual screens on the BMRS:

Generation – 2-14 Day Ahead Output Usable	Delete Zonal Tab
Generation – 2-52 Week Ahead Output Usable	Delete Zonal Tab
Generation – 1-5 Year Ahead Output Usable	Change name to 2 to 156 Week Ahead Output Usable Delete Zonal Tab Delete 1 Year Ahead to 5 Year Ahead buttons Delete Table Retain XML/CSV download buttons for NOU Add XML/CSV download buttons for National Surplus Add XML/CSV download buttons for National Margin Add XML/CSV download buttons for OU by Fuel Type Add XML/CSV download buttons for OU by BM Unit
Demand – 2-14 Day Ahead	Unchanged. Retain Surplus and Margins on this screen

Demand – 2-52 Week Ahead	Unchanged. Retain Surplus and Margins on this screen
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An API will also be added to download 2-156 week data for Output Usable, margin, surplus, Output Usable by Fuel Type and Output Usable by BMU.

### Changes to Code Subsidiary Documents

As a consequence of the changes to the BMRS and the data flows from NGENSO, it will be necessary to update the NETA Interface Definition and Design: Part 1, Interfaces with BSC Parties and their Agents document to reflect the changes to data flows from NGENSO to BMRA.

In addition, the BMRA User Requirements Specification (URS) document will be updated to reflect the changes to the BMRS reporting requirements.

Changes to these documents will be consulted on in the implementation phase, subject to P408 approval. Changes will be consulted on by November 2020.

### Process Changes

Under GC0130, most Generators providing data to the ELEXON REMIT platform will no longer be required by the Grid Code to submit data directly to NGENSO as well. NGENSO will use the Application Program Interface (API) on the REMIT platform to obtain the data they require. Other users will only be required to submit data via a TOGA replacement system upon change rather than the current process which requires them to submit the data on a daily basis.

## Applicable BSC Objectives

### Objective (a)

The [Standard Condition C17 of the Transmission Licence](#) requires NGENSO to comply with the [Security and Quality of Supply Standards \(SQSS\)](#). Section 5 of the SQSS requires NGENSO to operate the system such that it is secured against a range of fault outages. The analysis necessary to meet this condition requires generator outage data that is provided to NGENSO by Generators under Grid Code OC2. Ensuring timely, high quality outage data through the changes introduced by these modifications thus supports NGENSO in the efficient discharge of the obligations imposed on it by the Transmission Licence.

In addition, Appendix C of the SQSS refers to Plant Margins, which are determined from the Output Usable data obtained via OC2. Ensuring timely, high quality Output Usable data through the changes introduced by these modifications thus also supports NGENSO in the efficient discharge of the obligations imposed on it by the Transmission Licence.

### Objective (b)

The Introduction to Grid Code OC2, Operational Planning and Data Provision, states that OC2 is concerned with the co-ordination of the release of Power Generating Modules ... for construction, repair and maintenance. Improving the efficiency of the OC2 process



### What are the 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

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through these modifications thus supports NGENSO in the efficient, economic and co-ordinated operation of the National Electricity Transmission System.

### Objective (c)

Transparency supports market efficiency and competition. The publication of additional market information in the 2-3 year ahead timescales will improve transparency and thus promote effective competition in the generation and supply of electricity. Customer feedback to NGENSO and analysis of BMRS usage statistics suggests that the zonal data and year 4 and 5 Output Usable data are not significantly used by industry, and so their removal is unlikely to have any adverse impact on competition.

### Implementation approach

Implementation of this Modification should be on **25 February 2021**, as part of the BSC February 2021 Release. This is the first available BSC Release the Modification can target based on the timeframe to implement system changes.

GC0130 has gone to consultation with an implementation date of 'November 20 to February 21' and NGENSO have requested that if possible this Modification be implemented in the November 2020 release.

Whilst there is technically time to implement this change (18 weeks are available following the end of the Self-Governance window) based solely on lead time, there are a number of critical BMRS technology upgrades due this summer, uncertainty over the Trans European Replacement Reserved Exchange (TERRE) plan and other planned functional changes for BMRS in November 2020. Consequently, we do not believe the additional risk introduced by P408 in the November Release is acceptable and therefore recommend the scheduled February 2021 Release.



### Next steps

The Proposer requests that this Modification be sent directly to the Report Phase and hence be subject to the Report Phase Consultation. This is because the Modification makes the consequential changes necessary to the BSC as a result of Grid Code modification GC0130 i.e. GC0130 determines what needs to be published.

The Grid Code modification went through the Workgroup phase, and so industry has already had the opportunity through the workgroup and the workgroup consultation to feed into the overall solution across the codes. It would be inefficient to ask the industry to resource a second Workgroup to discuss the same topic, particularly where the BSC changes are minor and self-evident.

### Self-Governance Rationale

The Proposer believes this Modification should be treated as a Self-Governance Modification Proposal.

This Modification has no impact on the Code's governance or Modification Procedures or existing or future electricity consumers, and is not likely to discriminate between different classes of Parties. It will not impact sustainable development or management of market or network emergencies.

In isolation this BSC Modification does not have a material impact on security of supply as all the data covered by the Modification is already available to NGENSO. Similarly in isolation it does not materially impact the operation of the National Electricity Transmission System as the data available to NGENSO for the operation does not change. This Modification facilitates an improvement in the efficiency of how this information is obtained, but does not impact or change the existence of the information.

There will be some impact on competition through improved market transparency in years 2 and 3, however this is not judged to be material.

### Timetable

Proposed Progression Timetable	
Event	Date
Present Initial Written Assessment to Panel	14 May 20
Report Phase Consultation (10 Working Days)	18 May 20 – 1 June 20
Present Draft Modification Report to Panel	11 June 20
Final Modification Report published	15 June 20
Self-Governance Appeal Window (15 Working Days)	12 June 20 – 2 July 20

### What is the Self-Governance Criteria?

A Modification that, if implemented:

- (a) is unlikely to have a material effect on:
  - (i) existing or future electricity consumers; and
  - (ii) competition in the generation, distribution, or supply of electricity or any commercial activities connected with the generation, distribution, or supply of electricity; and
  - (iii) the operation of the national electricity transmission system; and
  - (iv) matters relating to sustainable development, safety or security of supply, or the management of market or network emergencies; and
  - (v) the Code's governance procedures or modification procedures; and

(b) is unlikely to discriminate between different classes of Parties.

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## 5 Likely Impacts and Costs

### Costs

ELEXON will be required to update the BMRS to reflect the changes to the reporting requirements and to implement the new legal text and document changes. The central implementation costs will be approximately £149K:

- £148K to amend and update BMRS; and
- £600 to implement the document changes.

Impact on BSC Parties and Party Agents	
Party/Party Agent	Potential Impact
BMRS Users	Will see some changes to the data available on the website, with the loss of Zonal Output Usable and four and five year ahead Output Usable, and the addition of margin, surplus and Output Usable by fuel type and by BM unit data for two and three years ahead. They will also see increased frequency of data refresh, from working day for 2-14 day ahead data, weekly for 2-52 week ahead data and twice yearly for the 2-3 year ahead data to daily for all timescales.
Generators	Ease the burden of data provision to the NGENSO by Generators. Will now need to access Output Usable data through the BMRS rather than having the option to access the data through TOGA
NGESO	Allow NGENSO to build an automated replacement system for TOGA. Changes in the obligations to publish data

Impact on Transmission Company
There is no impact from this Modification on any Transmission owner. The associated Grid Code Modification GC0130 is aimed at simplifying the outage planning process, which will help NGENSO release Transmission assets for maintenance, and so has an indirect impact on Transmission owners. NGENSO costs and impacts are born by GC0130.

Impact on BSCCo	
Area of ELEXON	Potential Impact
BSC Change	Implement this Modification.
Market Operations	Update BMRS API and Data Push Guide plus internal documentation

Impact on BSC Settlement Risks
This Modification only impacts planning data provided to the market from ESO, and so has no impact on Settlement

Impact on BSC Systems and processes	
BSC System/Process	Potential Impact
BMRS	As detailed in the solution section above, the Grid Code Modification will change the data available to be published on the BMRS, and so this consequential Modification will have an impact on the BMRS.

Impact on BSC Agent/service provider contractual arrangements	
BSC Agent/service provider contract	Potential Impact
BMRA	Will be required to undertake development work to deliver required updates to BMRS.

Impact on Code	
Code Section	Potential Impact
Q	Modify Section Q 6.1 of the BSC to align the obligations with those in the Grid Code
X-2	Remove reference to Zonal Output Usable

Impact on Code Subsidiary Documents	
CSD	Potential Impact
BMRA User Requirements Specification (URS)	Update to reflect file changes. Changes to this document will be consulted on in the implementation phase, subject to P408 approval. Changes will be consulted on by November 2020.
NETA Interface Definition and Design: Part 1	Update to reflect file changes. Changes to this document will be consulted on in the implementation phase, subject to P408 approval. Changes will be consulted on by November 2020.

Impact on other Configurable Items	
Configurable Item	Potential Impact
None	None

Impact on Core Industry Documents and other documents	
Document	Potential Impact
Ancillary Services Agreements	None
Connection and Use of System Code	
Data Transfer Services Agreement	
Distribution Code	

**Impact on Core Industry Documents and other documents**

Document	Potential Impact
Distribution Connection and Use of System Agreement	
Grid Code	This Modification is being raised as a consequence of a Grid Code Modification and so there is an impact on the Grid Code.
Master Registration Agreement	None
Supplemental Agreements	
System Operator-Transmission Owner Code	
Transmission Licence	
Use of Interconnector Agreement	

**Impact on a Significant Code Review (SCR) or other significant industry change projects**

We don't believe that this Modification impacts any ongoing SCRs. We requested SCR exemption from the Authority on 5 May 2020. We have not received a response yet, therefore we will be verbally updating the BSC Panel on 14 May 2020.

**Impact on Consumers**

The day to day operation of Balancing and Settlement would remain unaffected so there would be no direct impact to consumers.

**Impact on the Environment**

The day to day operation of Balancing and Settlement would remain unaffected so there would be no direct impact to the environment.

## 6 Recommendations

We invite the Panel to:

- **AGREE** that P408 progresses directly to the Report Phase;
- **AGREE** that P408:
  - **DOES** better facilitate Applicable BSC Objective (a);
  - **DOES** better facilitate Applicable BSC Objective (b); and
  - **DOES** better facilitate Applicable BSC Objective (c);
- **AGREE** an initial recommendation that P408 should be **approved**;
- **AGREE** an initial Implementation Date of:
  - 25 February 2021
- **AGREE** the draft legal text;
- **AGREE** an initial view that P408 should be treated as a Self-Governance Modification; and
- **NOTE** that ELEXON will issue the P408 draft Modification Report (including the draft BSC legal text) for a 10 Working Day consultation and will present the results to the Panel at its meeting on 11 June 2020.

## Appendix 1: Glossary & References

### Acronyms

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

Acronym	
Acronym	Definition
API	Application Program Interface
BM	Balancing Mechanism
BMRA	Balancing Mechanism Reporting Agent
BMRS	Balancing Mechanism Reporting System
BSC	Balancing and Settlement Code
eGAMA	electricity Generator Availability & Margin Analysis
ENTSO-E	European Network of Transmission System Operators for Electricity
GC	Grid Code
IWA	Initial Written Assessment
OU	Output Usable
REMIT	EU Regulation on Energy Market Integrity and Transparency
SCR	Significant Code Review
SQSS	Security and Quality of Supply Standards
TERRE	Trans European Replacement Reserved Exchange
TOGA	Transmission Outage and Generator Availability
URS	User Requirements Specification

### 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
1	GC0130	<a href="https://www.nationalgrideso.com/industry-information/codes/grid-code-old/modifications/gc0130-oc2-change-simplifying-output-useable">https://www.nationalgrideso.com/industry-information/codes/grid-code-old/modifications/gc0130-oc2-change-simplifying-output-useable</a>
4	Grid Code OC2	<a href="https://www.nationalgrideso.com/document/33856/download">https://www.nationalgrideso.com/document/33856/download</a>
4	EU Energy Market Integrity	<a href="https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2011:326:0001:0016:en:PDF">https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2011:326:0001:0016:en:PDF</a>
4	ENTSO-E	<a href="https://www.entsoe.eu/">https://www.entsoe.eu/</a>

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Page(s)	Description	URL
10	Transmission Licence	<a href="https://epr.ofgem.gov.uk/Content/Documents/Electricity%20transmission%20full%20set%20of%20consolidated%20standard%20licence%20conditions%20-%20Current%20Version.pdf">https://epr.ofgem.gov.uk/Content/Documents/Electricity%20transmission%20full%20set%20of%20consolidated%20standard%20licence%20conditions%20-%20Current%20Version.pdf</a>
10	SQSS	<a href="https://www.ofgem.gov.uk/licences-industry-codes-and-standards/standards/security-and-quality-supply-standard-sqss">https://www.ofgem.gov.uk/licences-industry-codes-and-standards/standards/security-and-quality-supply-standard-sqss</a>

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