

Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

P434 'Mandate to Half Hourly Settle the Non-Half Hourly Unmetered Supplies Metering Systems'

This Modification will require a period of mandatory Change of Measurement Class (CoMC) activity for all Non-Half Hourly (NHH) Unmetered Supplies (UMS) Metering Systems running from October 2023 to October 2024. It will also require all new UMS connections to be settled Half Hourly (HH) from October 2023. This will de-risk the Market Wide Half Hourly Settlement (MHHS) Transition Timetable. It will deliver Recommendation 8 by the Code Change and Development Group (CCDG) as set out in its [Consultation on the Transition Approach For Market Wide Half Hourly Settlement \(MHHS\)](#).



Elxon recommends P434 is progressed to the Assessment Procedure for an assessment by a Workgroup



Elxon does not consider it likely that P434 will impact the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the BSC

This Modification is expected to impact:

- Suppliers
- Licenced Distribution System Operators (LDSOs)
- Unmetered Supplies Operator (UMSOs)
- Meter Administrators (MAs)
- Half Hourly Data Collectors (HHDCs)
- Non Half Hourly Data Collectors (NHHDCs)
- Half Hourly Data Aggregators (HHDAAs)
- Non Half Hourly Data Aggregators (NHHDAAs)

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About This Document



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

- Have 5 mins? Read section 1
- Have 15 mins? Read sections 1, 4, 5 and 6
- Have 30 mins? Read all sections
- Have longer? Read all sections and the annexes and attachments

This document is an Initial Written Assessment (IWA), which Elexon will present to the Panel on 10 February 2022. The Panel will consider the recommendations and agree how to progress P434.

There are two 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 P434 Proposal Form.

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Market-wide Half-Hourly Settlement

Ofgem is introducing half-hourly settlement (HHS) on a market-wide basis in order to realise the full benefits of settlement reform. The successful introduction of MHHS is a key component of Ofgem's work to facilitate decarbonisation and smarter, more flexible energy sector.

What is the issue?

Market-wide Half-Hourly Settlement (MHHS) requires that all Metering System Identifiers (MSIDs) are settled on a Half-Hourly basis. The Code Change and Development Group (CCDG) has recommended moving Non Half Hourly (NHH) Unmetered Supplies (UMS) MSIDs to settle Half Hourly (HH) between October 2023 and October 2024, to mitigate the risk of not meeting the Transition Timetable set out by Ofgem in its [Full Business Case](#).

What is the proposed solution?

The obligations for UMS are set out in Section S8 of the Balancing and Settlement Code (BSC). It is proposed that the mandate to settle NHH UMS MSIDs on a HH basis is defined in this section of the BSC, together with, obligations on parties to co-operate in the Change of Measurement Class (CoMC) process. The obligations should also set out the deadline by which all NHH UMS MSIDs are migrated (October 2024 is current suggestion).

Impacts and costs

This Modification is expected to impact Suppliers, LDSOs, UMSOs, Meter Administrators, NHHDCs, HHDCs, HHDA, NHHDA. They may be required to amend systems and processes and costs are expected to be low and subject to further assessment and consultation.

This Modification is expected to impact [BSC Section S 'Supplier Volume Allocation'](#), [BSC Section X, Annex X-1 'General Glossary'](#) and [BSCP520 'Unmetered Supplies Registered in SMRS'](#). No BSC System changes are expected. The central implementation costs are therefore expected to be low. On-going costs will be determined during the Assessment Procedure and will largely depend on the role of Elexon and the Performance Assurance Board (PAB) for the migration activities.

Implementation

The CCDG and Proposer has recommended this Modification to be implemented as soon as possible to ensure all Unmetered MSIDs are settled HH by October 2024. We propose this Modification is implemented via a special release, five Working Days (WD) after the final Authority decision is made.

Recommendation

We recommend that the Panel agree to progress this Modification to the Assessment Procedure for consideration by a Workgroup.

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MHHS Transition Timetable.

Ofgem's decision is that the transition to MHHS should take place over 4 years and 6 months, with the transition beginning on the publication of its Full Business Case in April 2021 and ending in October 2025.

What is the issue?

The CCDG has recommended moving NHH UMS MSIDs to settle HH between October 2023 and October 2024 to mitigate the risk of not meeting the Transition Timetable set out by Ofgem in its Full Business Case.

If the transition for NHH UMS MSIDs is not brought forward, combined with the workload from other MHHS migration activities, it will significantly increase the risk that there will be insufficient time for Customers, Suppliers and UMSOs to address any issues that may arise with the transition to the MHHS Target Operating Model (TOM).

How will Unmetered Supplies be settled under the MHHS Target Operating Model?

The UMSO role will remain like the existing role for HH UMS supplies in receiving inventories from customers, validating and passing to the Unmetered Supplies Data Service (UMSDS). The requalification of the MA Role to the UMSDS is due to complete by September 2024. The current UMSO activity to determine NHH Estimated Annual Consumptions (EACs) and the associated processes will cease once the last NHH MSID has migrated to HH Settlement.

The Settlement Period level data will be calculated by the UMSDS. This service will be responsible for:

1. receiving inventory data associated with unmetered supplies from UMSOs;
2. validating the inventory data and responding to the UMSO, as appropriate;
3. accessing other dynamic information relating to the operation of Unmetered Supplies;
4. accessing standing data relating to Unmetered Supplies;
5. calculating Settlement Period level data for Unmetered Supplies; and
6. providing access to the calculated Settlement Period level data to the Market-wide Data Service (MDS) and other market participants.

The UMSDS will be an adapted version of the existing Settlement Market Role of Meter Administrator.

Background

What are Unmetered Supplies?

An Unmetered Supply means a supply of electricity to a particular inventory of equipment in respect of which a LDSO has issued an Unmetered Supply Certificate. For example, this equipment could be any electrical equipment that draws a current and is connected to the Distribution Network without a meter e.g. street lights, traffic signs, zebra crossings, etc.

An Unmetered Supply Certificate may be issued where:

- The electrical load is of a predictable nature, and

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- The electrical load is less than 500 watts; or
- It is not practical for a supply of electricity to be given through a conventional meter at the premises.

MHHS Recommendations

The Ofgem Significant Code Review (SCR) considering [Settlement Reform](#), also known as Market Wide Half Hourly Settlement (MHHS) was launched in July 2017. Under the SCR, the CCDG was convened to develop the MHHS TOM recommended by the Design Working Group (DWG).

The CCDG has [recommended](#) that a number of enabling changes are progressed before the full MHHS Design is baselined in 2022 and directed using Ofgem’s SCR powers. These changes will need to be raised to allow the required lead time to implement and comply.

They are to give effect to the CCDG’s recommendations 1, 3 and 8.

- **Recommendation 1** will require changes to the BSC and REC to introduce new SMRS registration data items and supporting processes to be implemented between November 2022 and February 2023.

A BSC Change Proposal will be raised in Q1 2022 to progress Recommendation 1.

- **Recommendation 3** will require the introduction as soon as possible of an obligation on Suppliers to ensure that all MSIDS with NHH settled CT Advanced Meters are moved to settle HH via the CoMC process by October 2023.

The CCDG initially considered whether there may need to be a consequential change under the REC and CUSC, however this is no longer the case because the Modification doesn’t have a direct impact on the REC, but a complimentary REC Change has been raised ([R0015 'Remote communication obligations for Advanced Meters'](#)). Also due to the timing of the CoMC activity a CUSC Change is no longer required.

P432 Modification was raised to progress Recommendation 3 on December 2021.

- **Recommendation 8** will require the introduction as soon as possible of an obligation on Suppliers to ensure that all Unmetered MSIDs are settled HH by October 2024. This will require changes to the BSC. The CCDG initially considered whether there may need to be a consequential change under the CUSC, however this is no longer the case due to the timing of the CoMC activity.

This Modification is in support of Recommendation 8.

The CCDG sought direction from Ofgem on how to progress their recommendations. [In response](#), Ofgem requested that these enabling changes are progressed through the existing code governance framework, with oversight by the MHHS Programme.

Desired outcomes

This Modification should put in place the mandate for Suppliers, LDSOs, UMSOs and Meter Administrators to co-operate in the CoMC process in order the move NHH settled UMS MSIDs to Half-Hourly Settlement in a timely manner to facilitate MHHS.

Proposed solution

The obligations for UMS are set out in Section S8 of the Balancing and Settlement Code. It is proposed that the mandate to settle NHH UMS MSIDs on a HH basis is defined in this section of the BSC, together with, obligations on parties to co-operate in the CoMC process. It is proposed the migration should be completed by October 2024. The obligations should also set out the deadline by which all NHH UMS MSIDs are settled on a HH basis.

The solution should also set a deadline by which any new UMS MSIDs have to be registered directly into the HH Settlement Process. It is proposed this is from October 2023. This deadline should also prevent any HH UMS MSIDs reverting to NHH Settlement. The proposed timescales for this Modification are based on the existing Ofgem MHHS Timeline.

Changes to the Balancing and Settlement Code Procedure (BSCP) BSCP520 'Unmetered Supplies Registered in SMRS' may also be required to refine the UMS CoMC process.

Data Cleanse and Planning

Data cleansing and migration activity can start at any time now that Ofgem has published the Full Business Case for the MHHS TOM. The UMISO will need to work with the Suppliers to cleanse erroneous or non-existent UMS MSIDs. The UMISO will need to logically disconnect where UMS no longer physically exists in consultation with the Supplier.

Once the data cleanse is complete the Supplier will need to develop a migration plan in conjunction with the UMISO, MA and HHDC to migrate portfolio of NHH UMS MSIDs to HH.

Key dates based on current MHHS timetable:

Jun 2022 new Data Transfer Network (DTN) data flows between UMISO & MA for Summary and Control files implemented ([CP1546](#))

From Oct 2022 (or earlier) to Oct 2023 – commercial arrangements agreed between Suppliers and organisations acting as Meter Administrators

From Oct 2023 (or earlier) to Oct 2024 – complete NHH to HH CoMC for all UMS MSID as mandated by this Modification

From Oct 2023 all new UMS connections shall be HH from date of connection as mandated by this Modification

These activities will then be followed by the migration to the TOM Service, the Unmetered Supplies Data Service, from Oct 2024 to Sept 2025 (or earlier).

Benefits

This change is part of the move to MHHS. The [Ofgem full business case](#) set out the benefits of implementing MHHS. Ofgem estimate MHHS will save consumers about £300m per year, with anticipated £4bn-£5bn consumer savings in total over the period to 2040. This change forms part of that implementation. For the avoidance of doubt the TOM Service will be unable to support the existing NHH settlement arrangements.



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

(d) Promoting efficiency in the implementation 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 administrating 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

Specifically, the HH Settlement calculation for UMS is more accurate as it models the behaviour of each piece of inventory data provided by the customer. For example, if a street light is switched off for a period during the night this behaviour will be modelled using the Charge Code which indicates the Circuit Watts for the street light and the Switch Regime which shows the pattern of behaviour. Likewise, if the street light dimmed to another light-out put the energy calculation will reflect the behaviour. In general terms the calculation will better reflect the energy consumed within a Settlement Period.

In the NHH calculation, EACs are calculated across the customer's inventory which is then applied to a static profile. These profiles are based on Profile Class 1 (the domestic profile) or Profile Class 8 (the flattest non-domestic profile) which do not reflect the consumption pattern of actual UMS. The NHH calculation does not take account of the fact that days are longer in summer or shorter in winter. Whereas the HH calculation uses actual sunrise and sunset times or derives them from the Astronomical Almanac.

This Modification will therefore result in more accurate and equitable Settlement, whilst reducing the MHHS delivery risks for relevant MHHS Participants.

Applicable BSC Objectives

It's the Proposer's view that this Modification better facilitates BSC Applicable Objectives (c) and (d).

Objective (c)

The Modification enables a smooth transition to the MHHS TOM for Unmetered Supplies. The Modification will promote effective competition in the generation and supply of electricity because the data will be more accurate and granular which will enable more accurate purchasing and promote innovation and competition.

Objective (d)

The HH Settlement of UMS is more accurate, efficient and robust than the NHH processes which currently require Material Error Monitoring processes to be undertaken on a regular basis. This Modification will therefore better facilitate Applicable BSC Objective (d) as it will introduce more efficient and effective processing of UMS data for Settlement.

Implementation approach

The CCDG recommended this change is implemented as soon as possible to ensure that all Unmetered MSIDs are settled HH by October 2024. The Proposer agrees and we therefore recommend this Modification is implemented via a special release, five WDs after Authority approval. This will provide the maximum lead time to meet the migration timescales that will be set by this Modification.

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4 Areas to Consider

In this section we highlight areas which we believe the Panel should consider when making its decision on how to progress this Modification Proposal, and which a Workgroup should consider as part of its assessment. We recommend that the areas below form the basis of a Workgroup's Terms of Reference, supplemented with any further areas specified by the Panel.

Areas to consider

The Workgroup should consider whether the data cleansing and Migration planning should be overseen by Elexon and the PAB or by the MHHS Programme. There also needs to be a coordinated approach for the migration planning, the Workgroup should consider if Supplier Migration Plans should be mandated as part of this Modification.

The current CoMC process in BSCP520 requires a new HH MSID to be created. The Workgroup should consider whether it is better to follow this existing process which requires a new MSID to be established with HH measurement class. To enable the CoMC the new HH MPAN is energised and the old NHH MPANs are de-energised on the day of change, and then subsequently disconnected. The other option is whether to change the CoMC process so that one of the existing NHH MSIDs is changed to HH and the remaining MSIDs are de-energised/disconnected.

The table below summarises the areas we believe a Modification Workgroup should consider as part of its assessment:

Areas to Consider
Consideration of the role of Elexon and the PAB in Migration planning and data cleansing.
Should the CoMC process in BSCP520 change?
Do Suppliers need to change their customers' contracts to reflect cost changes?
Consider whether Suppliers should seek commercial arrangements with MAs directly or if customers should have the option to pick their MA.
Assessment of the costs and benefits, where possible and needed.
How will P434 impact the BSC Settlement Risks?
What changes are needed to BSC documents, systems and processes to support P434 and what are the related costs and lead times? When will any required changes to subsidiary documents be developed and consulted on?
Are there any Alternative Modifications?
Should P434 be progressed as a Self-Governance Modification?
Does P434 better facilitate the Applicable BSC Objectives than the current baseline?
Does P434 impact the EBGL provisions held within the BSC, and if so, what is the impact on the EBGL Objectives?

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Next steps

This IWA will be presented to the BSC Panel at its meeting on 10 February 2022, where the Panel will decide how to progress the Modification Proposal. We recommend this Proposal progresses to the **Assessment Phase**, for a four month assessment by a Workgroup and follows the timetable below.

Although this Proposal has been developed and discussed by the CCDG, there are few areas that would still benefit from a targeted Workgroup assessment, as detailed in the proposed Terms of Reference above. Further, this Proposal is significant and material and therefore would not typically be considered suitable for going straight to the Report Phase.

Self-Governance

The Proposer and Elexon recommend that this Modification should not be considered suitable for Self-Governance and should be **sent to the Authority for approval**, as it materially impacts the Settlement of Unmetered Supplies, consequently impacting competition and consumers (Self-Governance criteria (a)(i) and (a)(ii)).

Workgroup membership and meeting approach

We propose that membership should be drawn from participants with experience and expertise in:

- CoMC processes;
- Settlement processes;
- Performance Assurance processes;
- Metering processes; and
- UMS processes.

We expect and will encourage participation from some CCDG Members and the Implementation Manager.

We had expected to progress this Modification alongside P432. However, as this Modification has been raised two months later than P432, we will progress them separately.

What is the Self-Governance Criteria?

A Modification that, if implemented:

(a) does not involve any amendments whether in whole or in part to the EBGL Article 18 terms and conditions; except to the extent required to correct an error in the EBGL Article 18 terms and conditions or as a result of a factual change, including but not limited to:

- (i) correcting minor typographical errors;
 - (ii) correcting formatting and consistency errors, such as paragraph numbering; or
 - (iii) updating out of date references to other documents or paragraphs;
- (b) 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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Timetable

Proposed Progression Timetable	
Event	Date
Present Initial Written Assessment to Panel	10 February 2022
Workgroup Meeting 1	W/C 7 March 2022
Workgroup Meeting 2	W/C 28 March 2022
Assessment Procedure Consultation (15WDs)	19 April 2022 – 11 May 2022
Workgroup Meeting 3	W/C 23 May 2022
Present Assessment Report to Panel	9 June 2022
Report Phase Consultation (10WDs)	15 June 2022 – 29 June 2022
Present Draft Modification Report to Panel	14 July 2022
Issue Final Modification Report to Authority	20 July 2022

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6 Likely Impacts and costs

Costs will be assessed during the Assessment Procedure. However, for those roles we believe will be impacted, we have indicated whether we believe the costs are likely to be high, medium or low based on the following categories:

- High: >£1 million
- Medium: £100-1000k
- Low: <£100k

Impact on BSC Parties and Party Agents		
Party/Party Agent	Potential Impact	Potential cost
Supplier	Suppliers will need to interact with the LDSO to undertake data cleansing activity and agree migration planning. System and process changes may be needed.	L
LDSO	May require system changes to manage the migration and to support data cleanse activities.	L

Impact on the NETSO	
Potential Impact	Potential cost
None identified	None

Impact on BSCCo		
Area of Elexon	Potential Impact	Potential cost
Assurance	Monitoring and managing the migration plans.	L

Impact on BSC Settlement Risks
This Modification will have an impact on the BSC Settlement Risk 011 SVA Risk: Unmetered Supplies volumes calculated incorrectly.

Impact on BSC Systems and processes	
BSC System/Process	Potential Impact
None	All existing systems expected to be able to accommodate this small change in activity.

Impact on BSC Agent/service provider contractual arrangements	
BSC Agent/service provider contract	Potential Impact
None	None anticipated at this stage.

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Impact on Code	
Code Section	Potential Impact
BSC Section S 'Supplier Volume Allocation'	Section S8 will need to set out the mandate and implementation timetable and the point at which new UMS connections will be HH.
BSC Section X, Annex X-1 'General Glossary'	There are 15 references to Unmetered Supplies that will need to be reviewed once NHH UMS connection is no longer available.

Impact on EBGL Article 18 terms and conditions
No impacts identified. This Modification is also not expected to extend the balancing terms and conditions.

Impact on Code Subsidiary Documents	
CSD	Potential Impact
BSCP520 'Unmetered Supplies Registered in SMRS'	BSCP520 may need to be updated to change the UMS CoMC process.

Impact on Core Industry Documents and other documents	
Document	Potential Impact
Ancillary Services Agreements	None anticipated at this stage.
Connection and Use of System Code	The CCDG initially considered whether there may need to be a consequential change under the Connection and Use of System Code (CUSC) to prevent NHH UMS MSIDs being double charged during the year in which they are migrated. It concluded that due to the implementation timing the potential double charging issues are avoided so a CUSC Modification is not needed.
Data Transfer Services Agreement	None anticipated at this stage.
Distribution Code	
Grid Code	
Retail Energy Code	
Supplemental Agreements	
System Operator-Transmission Owner Code	
Transmission Licence	

Impact on Core Industry Documents and other documents	
Document	Potential Impact
Use of Interconnector Agreement	

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

This Modification should be exempt of all open SCRs. Ofgem directed that this Modification be worked up by the MHHS Programme and be progressed by the BSC in their response to the [CCDG Recommendations](#).

Impact of the Modification on the environment and consumer benefit areas:	
Consumer benefit area	Identified impact
1) Improved safety and reliability	Neutral
2) Lower bills than would otherwise be the case	Neutral
3) Reduced environmental damage HH Settlement of UMS allows new technologies such as central management systems to be used to reduce lighting load which will help the move to net zero and de-carbonisation.	Positive
4) Improved quality of service The additional interaction with the Meter Administrator role is likely to improve the quality of service and benefits end consumers.	Positive
5) Benefits for society as a whole	Neutral



What are the consumer benefit areas?

- 1) Will this change mean that the energy system can operate more safely and reliably now and in the future in a way that benefits end consumers?
- 2) Will this change lower consumers' bills by controlling, reducing, and optimising spend, for example on balancing and operating the system?
- 3) Will this proposal support:
 - i) new providers and technologies?
 - ii) a move to hydrogen or lower greenhouse gases?
 - iii) the journey toward statutory net-zero targets?
 - iv) decarbonisation?
- 4) Will this change improve the quality of service for some or all end consumers. Improved service quality ultimately benefits the end consumer due to interactions in the value chains across the industry being more seamless, efficient and effective.
- 5) Are there any other identified changes to society, such as jobs or the economy.

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7 Recommendations

We invite the Panel to:

- **AGREE** that P434 progresses to the Assessment Procedure;
- **AGREE** the proposed Assessment Procedure timetable;
- **AGREE** the proposed membership for the P434 Workgroup; and
- **AGREE** the Workgroup's Terms of Reference.

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Appendix 1: Glossary & References

Acronyms

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

Acronym	
Acronym	Definition
CCDG	Cross Code an Development Group
EAC	Estimated Annual Consumption
HH	Half Hourly
HHDA	Half Hourly Data Aggregators
HHDC	Half Hourly Data Collectors
LDSO	Licensed Distribution System Operators
MA	Meter Administrator
MHHS	Market-wide Half-Hourly Settlement
MPAN	Meter Point Administration Numbers
MSID	Meter System Identifiers
NHH	Non Half Hourly
NHHDA	Non Half Hourly Data Aggregators
NHHDC	Non Half Hourly Data Collectors
PAB	Performance Assurance Board
TOM	Target Operating Model
UMS	Unmetered Supplies
UMSDS	Unmetered Supplies Data Service
UMSO	Licensed Distribution System Operators

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
1,5	CCDG Recommendations	https://www.elexon.co.uk/documents/industry-consultations/2021-industry-consultations/code-change-development-group-consultation-on-mhhs-recommendations-sept2021/
3,6	Ofgem Full Business Case	https://www.ofgem.gov.uk/publications/electricity-retail-market-wide-half-hourly-settlement-decision-and-full-business-case

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External Links		
Page(s)	Description	URL
3,12	BSC Section S 'Supplier Volume Allocation'	https://www.elexon.co.uk/the-bsc/bsc-section-s-supplier-volume-allocation/
3,12	BSC Section X, Annex X-1 'General Glossary'	https://www.elexon.co.uk/the-bsc/bsc-section-x-annex-x-1-general-glossary/
3,12	BSCP520 'Unmetered Supplies Registered in SMRS'	https://www.elexon.co.uk/csd/bscp520-unmetered-supplies-registered-in-smrs/
5	Settlement reform	https://www.ofgem.gov.uk/energy-policy-and-regulation/policy-and-regulatory-programmes/electricity-settlement-reform
5	R0015 'Remote communication obligations for Advanced Meters'	https://recmanagerb2c.b2clogin.com/recmanagerb2c.onmicrosoft.com/B2C_1A_signup_signin_saml/samlp/sso/login
5	Ofgem's response to CCDG	https://www.ofgem.gov.uk/sites/default/files/2021-10/Ofgem%20response%20to%20CCDG%20recommendations%20on%20the%20MHHS%20Transition%20Approach.pdf
6	CP1546 'Introducing DTC flows to transfer UMS Summary Inventories and Control files'	https://www.elexon.co.uk/change-proposal/cp1546/
11	011 SVA Risk: Unmetered Supplies volumes calculated incorrectly	https://www.elexon.co.uk/reference/performance-assurance/performance-assurance-processes/011-sva-risk-unmetered-supplies-volumes-calculated-incorrectly/

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