

ELEXON

QUARTERLY PERFORMANCE ASSURANCE REPORT

Quarter 4 – 2020/21

Public

Contents

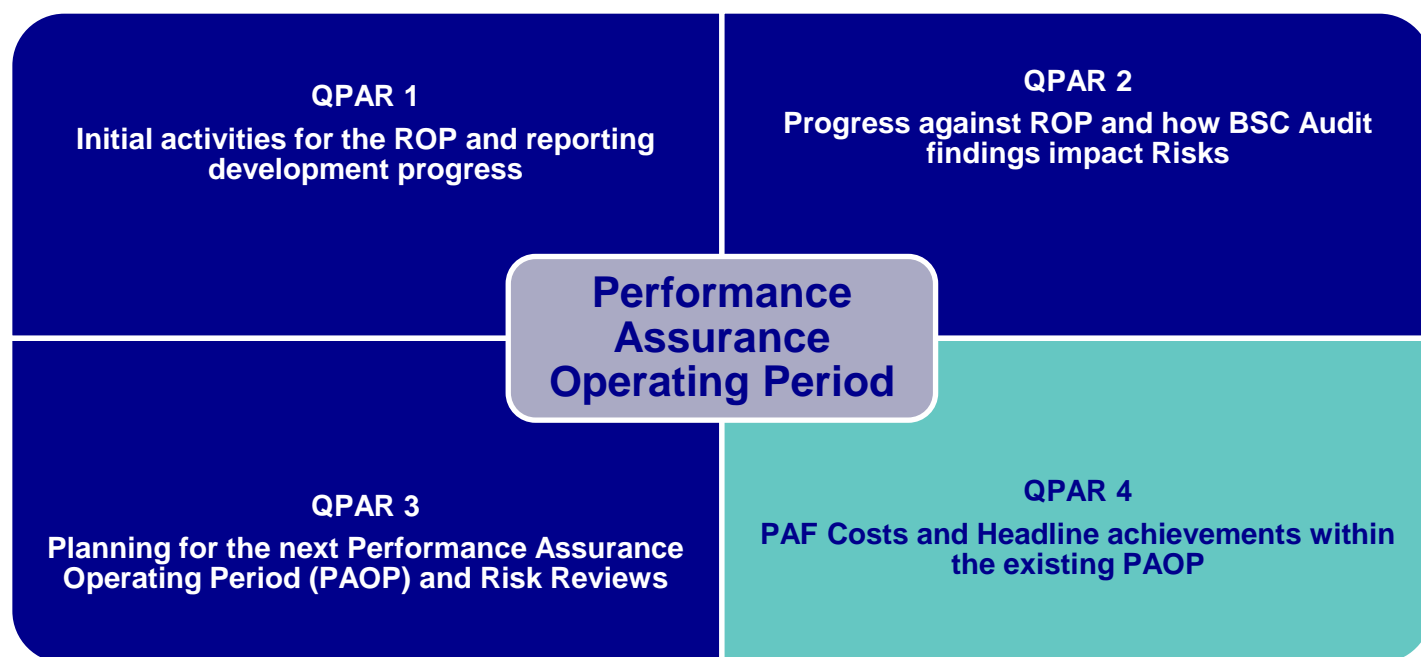
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Overview

The Performance Assurance Board (PAB) is required, by Balancing and Settlement Code (BSC) Section Z 8.1¹, to prepare an Annual Performance Assurance Report (APAR). Following the PAF Review, ELEXON intends to provide a Quarterly Performance Assurance Report (QPAR), which includes:

- Results from risk evaluation and risk assurance procedures focussing on the outcome of deployment of Performance Assurance Techniques (PAT);
- The actual costs associated in delivering the Performance Assurance Framework (PAF) compared with the estimated costs set out in the Risk Operating Plan (ROP); and
- Recommendations for modifying the Performance Assurance Techniques.

In addition, the content of the QPAR will focus on the Performance Assurance activities undertaken within the previous quarter. This may mean that, within each QPAR, the content and information provided changes or has a specific focus in line with activities undertaken. Elexon will, over the course of the four quarterly reports, cover the full scope of the Performance Assurance Framework and our Risk Operating Plan. As a guide, we anticipate the four quarterly reports to have focus on the following areas



¹ <https://www.elexon.co.uk/bsc-and-codes/balancing-settlement-code/bsc-sections/>

Key Points of Progress

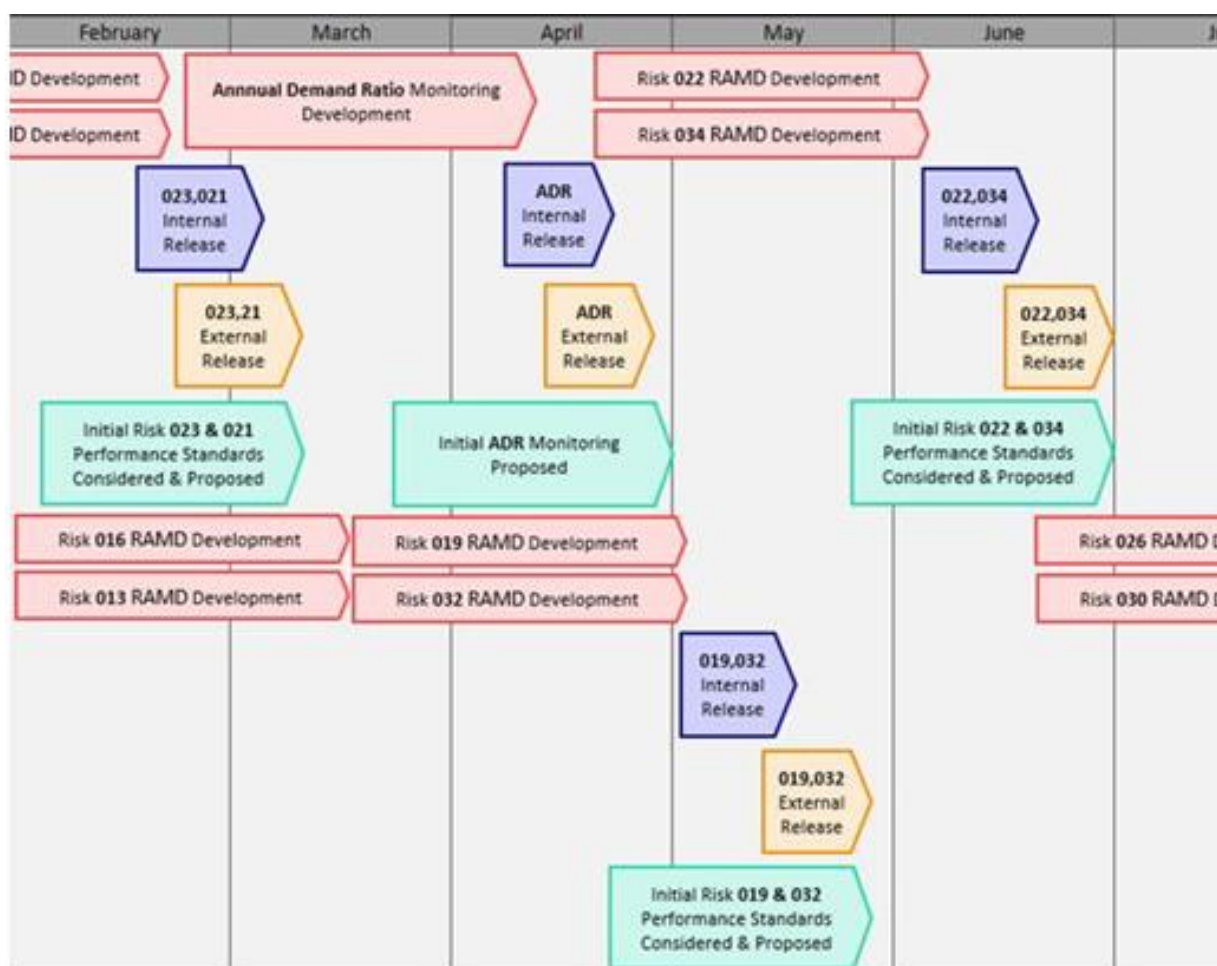
Ongoing development of Risk Reporting

Elxon is continuing to produce reporting for all key Risk areas to support Performance Assurance activities. Elxon has streamlined the delivery of reporting by adopting the following principles:

- Scale back the level of detail of planned reporting;
- Focus only on data we already have available and which is most relevant to the material impact of each Risk area; and
- Schedule the delivery of smaller, but more frequent products.

In response to the appetite expressed by the PAB to focus additional assurance resource on the monitoring and mitigation of Central Volume Allocation (CVA) Risks, Elxon proposes further amendments to the development roadmap for our new Risk Analytics and Monitoring Dashboards (RAMD). The proposed amendments would see work on dashboards for CVA Risks brought forward to be completed prior to work being resumed on additional Supplier Volume Allocation (SVA) Risk dashboards.

Our delivery schedule is outlined below, Elxon has outlined the progress of each Risk Analytic and Monitoring Dashboard (RAMD) in the Focused Risk and Event Overview section below.



Risk Landscape

- Our Risk Evaluation Register (RER) contains a total of 34 Risks. 18 Risks relate to Supplier Volume Allocation (SVA) processes, and 16 to Central Volume Allocation (CVA).
- We have been regularly reviewing the market operations impacted by COVID-19 for adjustments to be made to Risk impacts. Over the course of the 2020/21 Performance Assurance Operating Period (PAOP), BSC Parties and their Agents have advised of significant reductions to site visits and the adoption of remote working, while focusing on resolving backlogs that can be processed remotely.
- Market operations remain impacted by the COVID-19 disruption and subsequent lock downs during Q4 and beyond. We will continue to monitor impacts on Performance Assurance Parties (PAPs), and will focus on supporting the recovery of the market in the 2021/22 PAOP.

Risk Manager Update

During this period of uncertainty and unprecedented conditions for the Energy Market, we have continued to develop supportive and appropriate measures within Performance Assurance, to mitigate and manage the issues arising from COVID-19 and lockdowns across the various regions of the country.

We have seen further national lockdowns which are continuing to impact performance across all Market sectors.

Our Risk approach within Elexon remains to re-assess and re-prioritise Risks in accordance with changes in how Risks impact the market. In addition, we continue to monitor performance of Parties at this time, but will not recommend the deployment of Performance Assurance Techniques (PATs), other than in exceptional cases.

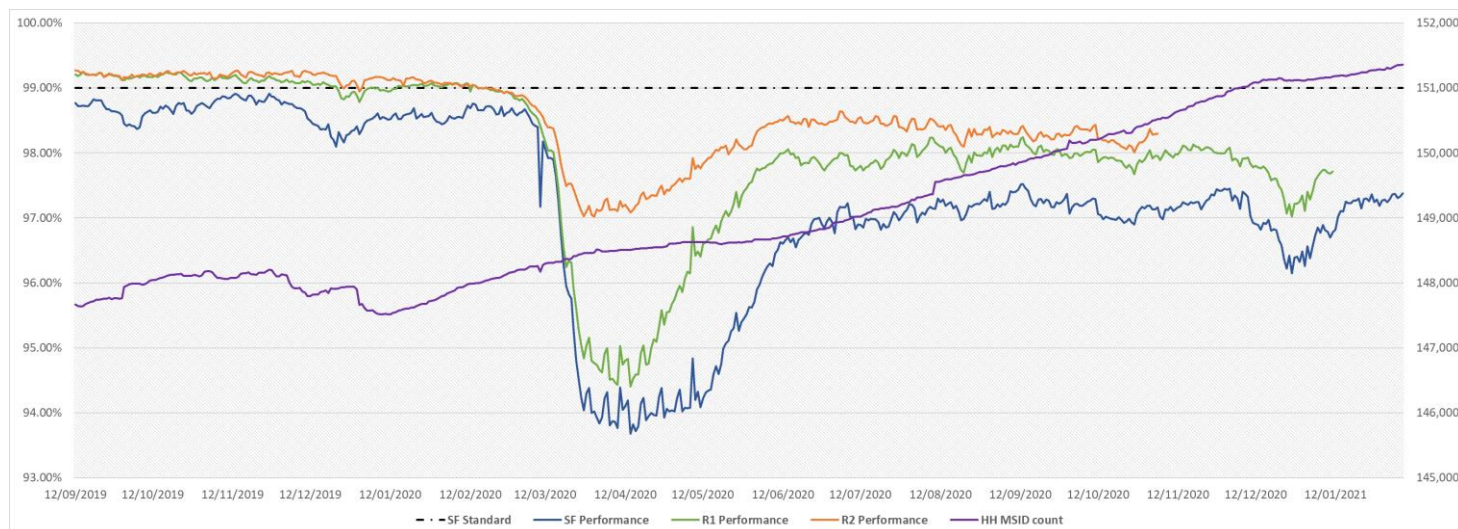
During the next quarter, in addition to the ongoing monitoring of market operations, our Risk Team will focus on the Risk areas highlighted in the new [Risk Operating Plan \(ROP\)](#). This includes providing regular updates to the Performance Assurance Board (PAB) on CVA Risks, and assessing the impact of the transition of Code requirements to the Retail Energy Code (REC).

If you have any questions regarding Risk, please contact risk@elexon.co.uk.

Key Industry Metrics

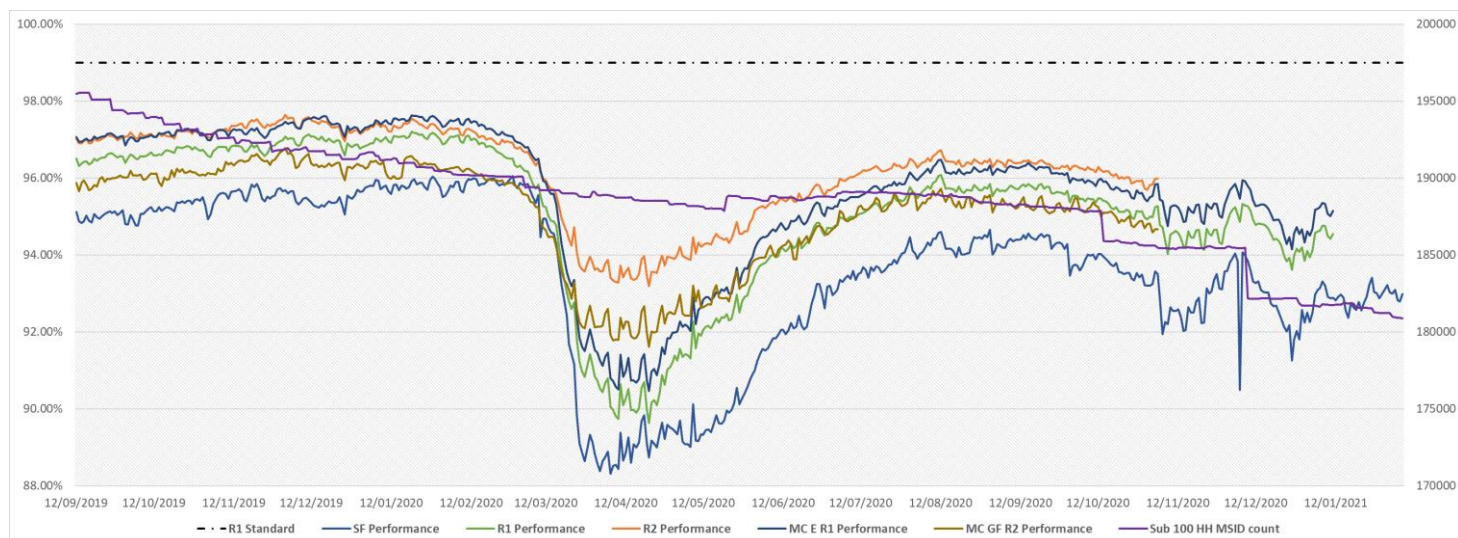
Elexon has provided a high-level overview of the Market Performance across the most recent quarter of settled dates at each Settlement Run, for the Half Hourly (HH) Measurement Class C Market, the Sub-100kWh Half Hourly Market, and the Non-Half Hourly (NHH) Market. For a detailed analysis of the Market performance across each month, please find the recent [Risk Reports: Insight and Guidance on Settlement](#) available on the Elexon website.

HH Market



The HH Market recorded an interruption in performance recovery as the market continues to experience disruption from the impacts of the winter lockdowns as a result of COVID-19. SF performance has remained within 96.15-97.45%, the lowest performance during Q3 was recorded on 26 December 2020, whilst the highest performance was recorded on 2 December 2020. R1 Performance has remained between 97.02-98.13%, the lowest performance was recorded on 26 December 2020, whilst the highest performance was recorded on 18 November 2020.

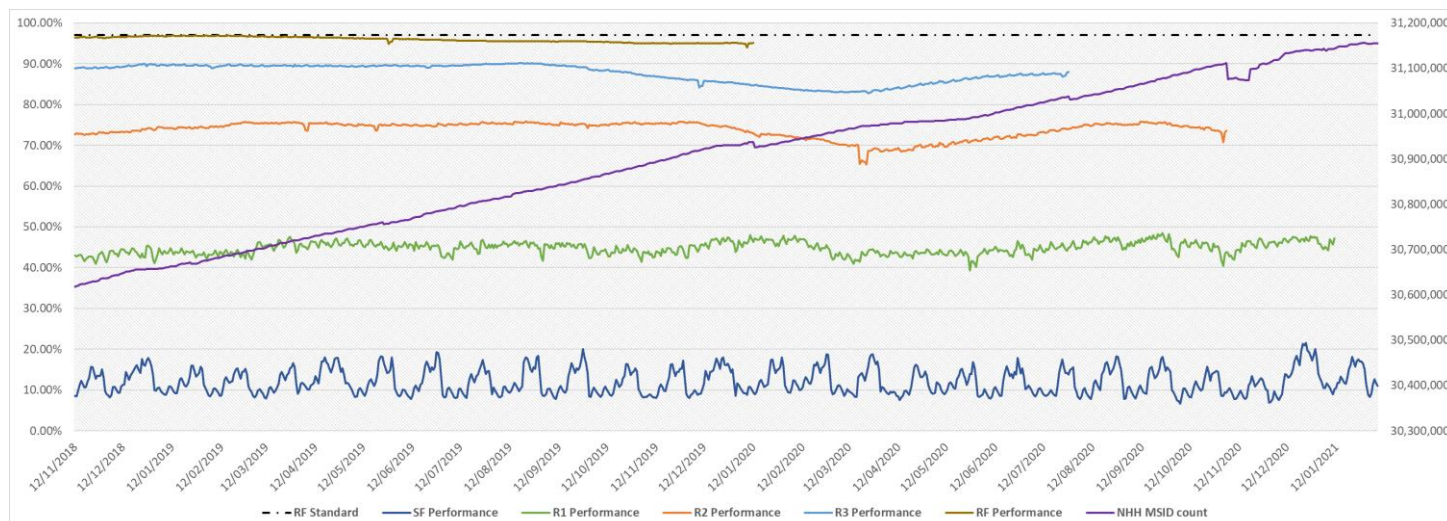
Sub 100kWh HH Market



The Sub 100kWh HH Market recorded an interruption in performance recovery as the market continues to experience disruption from the impacts of the winter lockdowns as a result of COVID-19. SF performance peaked during Q4 at 94.07% on 7 December 2020, whilst reaching its lowest performance of 91.26% in the quarter on 26 December 2020. R1 performance peaked at 95.48% on 12 October 2020, whilst reaching its lowest performance of 93.61% on 26 December 2020.

Quarterly Performance Assurance Report

NHH Market



The NHH Market recovery continues in R3 and RF, however the impact of the winter lockdowns can be observed in the downturn in performance at R2. Elxon have identified that the sharp fall and recovery in performance observed in recent recorded performance is related to a timing issue with a Data Aggregator (DA) issuing files to the SVAA for inclusion in Settlement.

R1 performance continues to vary between 40.49 and 47.25%, reaching its lowest recorded performance on 2 November 2020, and its highest performance on 11 January 2021. R2 performance displays the impact of the winter lockdowns, however it has remained above 70%, with performance varying between 70.81 and 75.81%, reaching its lowest performance on 2 November 2020 and its highest performance on 13 September 2020. R3 performance reached its lowest at 84.80% on 27 April 2020 but has improved reaching 87.95% on 28 July 2020. RF performance is yet to record an improvement in performance however it has plateaued, with performance falling from 95.32% on 10 October 2019 to 95.04% on 12 January 2020.

Focussed Risk and Event Overview

Risks

Publishing Risk Analytic & Monitoring Dashboards

Elxon has considered publishing the reporting and analytics produced as part of our Risk Dashboards development work. Currently we have dashboards in place for Risks 3, 7, 5, 12, 21 and 23.

Elxon propose that confidential and non-confidential reporting items are considered separately

Non-confidential risk indicators and metrics:

- To be reviewed and validated internally
- After being used internally for at least three months in order to give the risk owners to get comfortable with the data - to be published on the Elxon website under the Assurance page
- Comments and feedback invited from customers in respect of the data.

Confidential risk indicators and metrics:

- To be reviewed and validated internally
- Identify which items could be potentially published and engage with market participants in order to assess appetite for Elxon to publish this data
- If customers express appetite in having this data published
 - Then those items which customers expressed appetite for us to publish will be progressed for publication which will require;
 - A Panel paper proposing the data is published and why;
 - Industry consultation allowing customers the opportunity to argue against the data being published;
 - Panel approval, or otherwise, following review of consultation responses.

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

Elxon has been working with its customers who have been validating the Risk Analytic & Monitoring Dashboards and their underlying calculations, they have advised that the reporting and queries are accurate. However the reporting is impacted by virtually integrated parties that do not send Data Flows over the Data Transfer Network (DTN) and therefore data items can appear missing in processes that are compliant.

Elxon will continue to engage with its customers to improve and refine reporting for their needs.

Elxon is currently reviewing the impacts on MOAs of the Retail Energy Code (REC) 2.0 that will go live in September 2021 and is working on an assurance transition plan and redlining for the transfer of MEM obligations to the REC. This is likely to have a significant impact on the Risk factors associated with Settlement Risks that MOAs have a significant interest in, such as Risk 3.

Risk 5 – Fault Resolution

Elxon is undertaking an internal data validation exercise relating to Risk 5, to ensure that the data produced within each section of the report is valid and an accurate reflection of market conditions. Following successful internal validation, Elxon will move to User Acceptance Testing and update the Market on the progression of testing until full implementation is complete.

Risk 7 – Retrieval of Metered Data

Elxon has been working with its customers who have been validating the Risk Analytic & Monitoring Dashboards and their underlying calculations, they have advised that the reporting and queries are accurate. However the reporting is impacted by virtually integrated parties that do not send Data Flows over the Data Transfer Network (DTN) and therefore data items can appear missing in processes that are compliant.

Elxon will continue to engage with its customers to improve and refine reporting for their needs.

Elxon has also been made aware that Paknet, a type of remote communications method, is being ceased as a service on 31 March 2022. Vodafone have informed Elxon that their instruction to customers is to order any replacements to any existing Paknet services by 31st October 2021 to allow enough time for delivery and the subsequent ceasing of legacy services. Elxon expects MOAs and Suppliers to be aware of this and working towards replacing Paknet services over the next 6 months to ensure minimum disruption to Settlement.

Risk 12 - Metering Equipment Technical Detail Quality

Elxon is undertaking an internal data validation exercise relating to Risk 12, to ensure that the data produced within each section of the report is valid and an accurate reflection of market conditions. Following successful internal validation, Elxon will move to User Acceptance Testing and update the Market on the progression of testing until full implementation is complete.

Risk 13 – Manual Adjustments

Elxon has progressed with the development of the Risk 13 RAMD. Elxon is scheduled to present the Risk 13 RAMD to the PAB meeting in April 2021. For further information please refer to Risk Dashboard Development Paper in [PAB243](#)

Risk 16 – Energisation Status

Elxon has progressed with the development of the Risk 16 RAMD. Elxon is scheduled to present the Risk 16 RAMD to the PAB meeting in April 2021. For further information please refer to the Risk Dashboard Development Paper in [PAB243](#)

Risk 21 – CVA Metered Data Retrieval

Following successful User Acceptance Testing, Risk 21 reporting has been rolled out internally to the Risk Owners who are monitoring the performance metrics to identify trends or issues with party performance. Elxon will share the RAMD reporting with the PAB via the monthly Risk Report when there are exceptions in the reporting that require a Risk Management Determination.

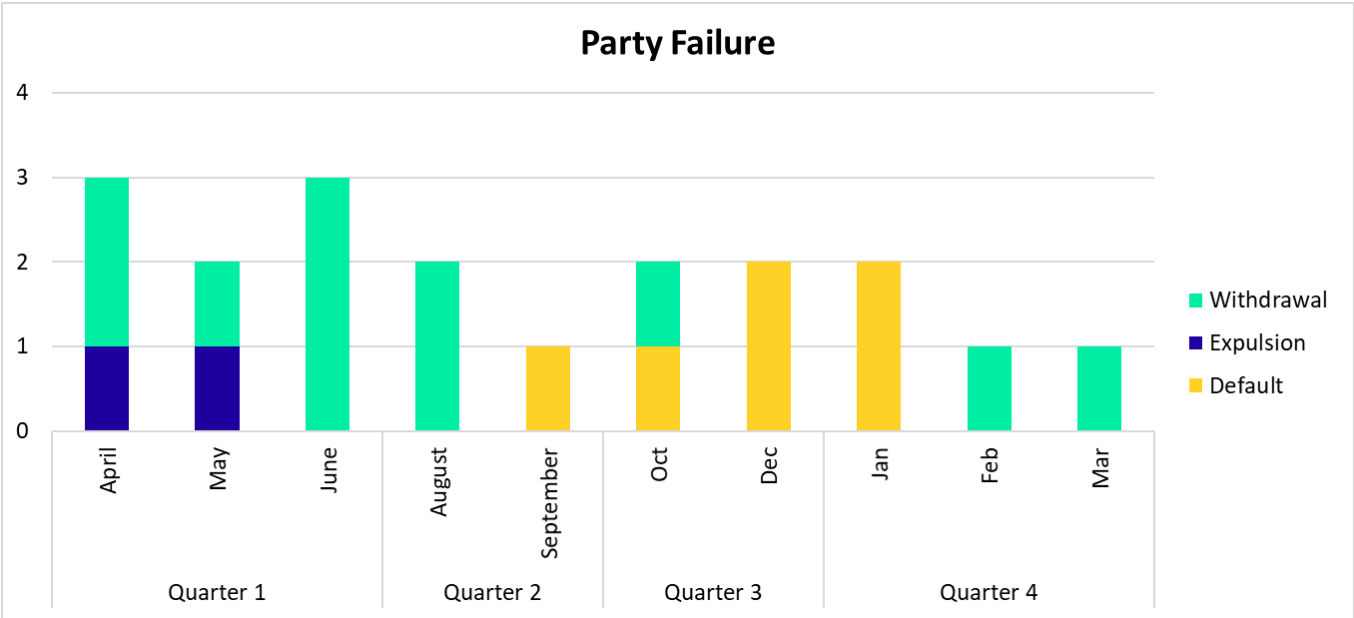
Risk 23 – CVA Fault Resolution

Following successful User Acceptance Testing, Risk 23 reporting has been rolled out internally to the Risk Owners who are monitoring the performance metrics to identify trends or issues with party performance. Elxon will share the RAMD reporting with the PAB via the monthly Risk Report when there are exceptions in the reporting that require a Risk Management Determination.

Risk Events

Party Failure

Elxon has processed 11 Party Withdrawals from the BSC in the 2020/21 PAOP. Two Parties were expelled from the BSC in the first quarter of the PAOP, and 5 parties underwent default in the 2020/21 PAOP.



Other Notable Risk Updates

Key Achievements for the 2020/21 Performance Assurance Operating Period

Elxon has made significant progress against its Risk Operating Plan 2020/21 in spite of the disruption to its operations as a result of the COVID-19 pandemic. The Risk Team has continued to deliver notable Risk management controls across the industry. These include:

- The full implementation of a monthly Risk Report
- Creation of reporting relating to COVID-19 Impacts
- Implementation of COVID-19 Performance Assurance derogations
- Implementation of a COVID-19 impacted Risk Evaluation Register
- Implementation of COVID-19 Performance Assurance Technique changes
- Continued development of Risk Assessment & Monitoring Dashboards

Further detail on the key achievements for the 2020/21 PAOP can be found in the [Risk Operating Plan 2021/22](#).

Summary of Costs for Delivering Performance Assurance

The Costs for delivering Performance Assurance for the 2020/21 PAOP:

Cost Type	2020/21 Forecast (£k)	2020/21 Actual (£k)
Operational	£675	£1,109
Contractual	£2,765	£2,168
Total	£3,415	£3,277

Elxon derived the 2020/21 contractual costs from the BSC budget forecasts as of February 2021. These figures include RPI and are subject to amendment to reflect contractual changes and changes to indicative costs (e.g. ad hoc and variable expenses).

Contractual costs for 2020/21 are less than forecast for the year, due to the restrictions imposed on third party contractors to carry out particular Assurance techniques during the COVID-19 lockdowns and other restrictions.

The increases noted in 2020/21 operational costs can be attributed to improved data provided by timesheet codes, which were implemented during this PAOP. These internal data improvements have enabled us to provide a clearer, more representative view of Assurance activities across Elxon.

Further detail on the costs for the 2020/21 PAOP can be found in the [Risk Operating Plan 2021/22](#).

Derogations for COVID-19 Lockdowns across Great Britain

As a response to the COVID-19 lockdown, the PAB approved a number of derogations to BSC obligations to enable Suppliers to instruct their Agents to process estimates that better reflected consumption during the lockdown period. At its September meeting, the PAB agreed that the derogations should end on 31 December 2020 and issued a three month notice period to the industry to start on 1 October 2020.

On 31 October 2020, the Prime Minister announced that a second lockdown would take place in England from 5 November 2020 to 2 December 2020. Consequently, the PAB determined that the notice to end the derogations should be rescinded.

Quarterly Performance Assurance Report

Following the announcement of increased restrictions by the Governments of Great Britain in January 2021, the PAB agreed that Elexon should review, on a quarterly basis (April, July, October and January):

- the current state of restrictions (including the likelihood of further lockdown periods being required),
- the number of sites remaining within the derogation process, and
- feedback from BSC Parties and Party Agents

Based on these reviews, Elexon would determine whether the derogations were still required and provide the PAB with appropriate updates.

The PAB has indicated that its preferred approach is to wait until it was certain all national and local lockdowns had concluded prior to ending the derogations. Accordingly, Elexon's first quarterly review has concluded that it would be premature to end them at this time:

- Whilst restrictions across Great Britain were loosened throughout April, significant portions of the economy remain closed. At present we do not know what impact the current changes will have on relevant industry processes such as obtaining reads or carrying out repairs and Meter replacements.
- We also do not know what impact the current changes will have on relevant public health metrics. The further re-opening of the economy in all three nations is heavily contingent on these and could be delayed or rolled back should there be, for example, a spike in the infection rate or an interruption to the vaccine supply. It is notable that the last major loosening of restrictions was followed by the re-imposition of stricter measures in November 2020 and January 2021.

Elexon proposes that the derogations remain in place, and that Elexon continues to provide updates to the PAB in line with the approach agreed in January 2021. These will normally follow the quarterly process described, but, should there be (for example) any significant announcements from the respective Governments of Great Britain, an appropriate update will be provided.

Further information on [The Update to COVID-19 Guidance Notes can be found here.](#)

Grid Supply Point _A Issue

Elexon can confirm that a metering issue that caused the submission of incorrect metering data in GSP Group _A has been fixed. The incorrect data resulted in a Settlement Error leading to the need for significant reconciliation sums

Maintaining Settlement accuracy is of upmost importance to us and after we reported the metering issue in Newscast on 21 December 2020 we urgently undertook an investigation to establish the root cause of the issue.

The investigation found that during the work carried out at a Grid Supply Point (GSP), on behalf of a Licenced Distribution System Operator (LDSO) and the Transmission System Operator (TSO), to replace one of the three Super Grid Transformers (SGTs), a Meter for one of the other SGTs was damaged.

As a result, the damaged Meter had not been recording consumption. The overall impact was that the total volumes of the GSP had been under-recording by approximately one third since July 2019.

The gross correction in Settlement associated with the issue is approximately £28m and most of this correction will be achieved via adjustments of Supplier and Generator volumes in the normal Settlement Reconciliation Runs from February to August 2021.

In line with Settlement principles some Parties will receive sums as a result of the reconciliation and others will need to pay, reflecting historic over, or under charging based on the previously incorrect data. We have been contacting impacted Parties to explain these adjustments. Additionally, a Trading Dispute has been raised, which equates to approximately £12m of the total gross amount. Trading Disputes provide a mechanism for correcting Settlement, which cannot be corrected via normal Settlement Reconciliation Runs.

Quarterly Performance Assurance Report

Elexon proposed a full lessons learned exercise and the BSC Panel's Performance Assurance Board (PAB) has endorsed this. The exercise will:

- Assess the root cause(s) in detail
- Consider whether any remedial actions are needed
- Re-assess the associated Settlement Risk in light of the metering issue
- Investigate revisions to technique deployment to prevent re-occurrence
- Report back to PAB and the industry on the findings

Elexon will provide more information on progress of the lessons learnt exercise when this is available.

PAF Review Recommendations

The Performance Assurance Framework Final Report was presented to the BSC Panel on 11 March 2021. The report detailed the issues, learnings, conclusions and recommendations identified by the review and proposed that a regular update be provided to the Performance Assurance Board.

PAF Review Recommendations	
Completed	41
Work In Progress	25
Not Started	25
No Longer Relevant	3
Total	94

By the end of the 2020/21 period, 71% of the recommendations have either been implemented or are work in progress. We are continuing to progress implementing the PAF Review recommendations and will provide a further update in the Quarterly Performance Assurance Report due in July 2021.

Reference Data Risk

The Targeted Charging Review (TCR): Significant Code Review (SCR) is an OFGEM led project that assessed how residual network charges should be set and recovered in Great Britain by Licensed Distribution System Operators (Distributor Network Operator's (DNO's) and Independent Distribution Network Operators (IDNOs)) and the National Electricity Transmission System Operator (NETSO).

The unprecedented growth in the size of the MDD and LLF datasets presents challenges for Elexon's Central Systems – in the first instance, the new LLFCs and valid set combinations simply need to be added to MDD and the LLF dataset, and communicated to Parties and Party Agents; Central Systems and participants' systems must then receive, process and send larger data flows and datasets caused by the growth in LLFCs and valid set combinations.

In the December SVG Meeting ([SVG238](#)), the committee approved the Distributor Network Operator's (DNO's) TCR Change Request's (CR's) to be published in January 2021.

SVG and the BSC Panel decided not to progress any further Change Requests for TCR until testing had been carried out to mitigate the risk that Central Systems and Participant's systems cannot handle the growth in LLFCs and valid set combinations. This also poses a risk to industry processes, e.g. Imbalance Settlement, to fail.

The Industry and Central system Testing was carried out between January and March. The Overall finding is that Central Systems will need some combination of increased processing resources/coding changes in order to handle the expected increased data volumes successfully.

Therefore the Central System tests demonstrated that the relevant current BSC Central Systems applications solutions will not be able to handle the increase in data planned for the TCR. Some combination of increased processing resources (system memory & CPU), code changes and configuration changes will be required in order to handle the expected increased data volumes successfully.

Quarterly Performance Assurance Report

The required changes will need to be tested and implemented before the IDNO Change Requests will be recommended to the SVG for approval. The initial estimate to carry out this work is 17 weeks, Elexon is working closely with our service providers to schedule and prioritise these updates to the Central Systems.

Noting that as the limitations are resolved there is still a risk that limits are reached in other areas of the system.

Elexon will continue to manage the risk of this system as with all Central Systems on a day to day basis. But the risk is increasing on the legacy systems and this is an example of the case we are seeking to avoid in progressing the Kinect programme.

Technique Updates

BSC Audit Market Issues

Elexon and the BSC Auditor are in the process of drafting the BSC Audit Report and the Market Issues for Performance Assurance Operating Period 2020/21, and will present the findings to the Performance Assurance Board in [PAB244](#). Elexon will be uploading the Market Issues and the Market Issues Action Log to the Elexon website [here](#).

Elexon notes that remote Auditing, first trialled in March 2020, and since utilised industry-wide for the 2020/21 Audit period due to restrictions imposed during the COVID-19 disruption, has been highly effective. Comments from audited parties note that the changes were well received.

Disputes

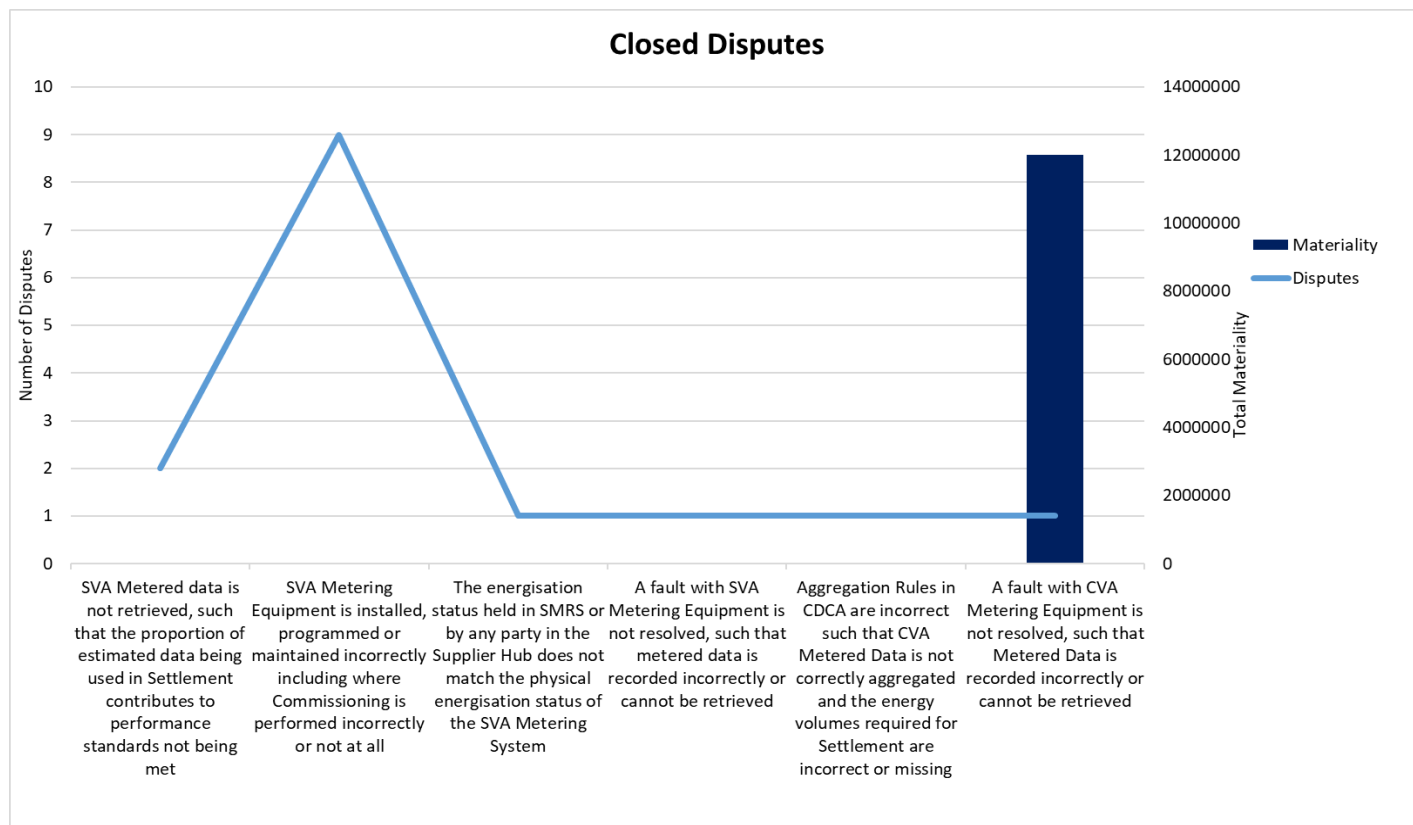
Q4 Summary

Elexon resolved 15 Trading Disputes between January and March 2021. The Trading Disputes Committee (TDC) upheld 10 of the Trading Disputes noting their material impact to Settlement. Five Trading Disputes were found to be invalid and were closed by Elexon.

Five of the Trading Disputes upheld by the TDC were related to Risk 3, with a combined Materiality of £41,709.

The largest Material Trading Dispute related to a Grid Supply Point (GSP), which had been under-recording by approximately one third, with materiality of approximately £12M. The Trading Dispute related to Risk 23 and was upheld by the TDC in March 2021.

The Trading Dispute Team's focus over the next three months will be on progressing 32 Trading Disputes that remain outstanding. Trading Disputes are currently taking longer to progress than usual, as lock-down restrictions continue to limit access to sites to correct errors and perform Commissioning tests. One open Trading Dispute, relating to Risk 3, has an estimated materiality of £1.4M and is being progressed as a priority.



Error and Failure Resolution

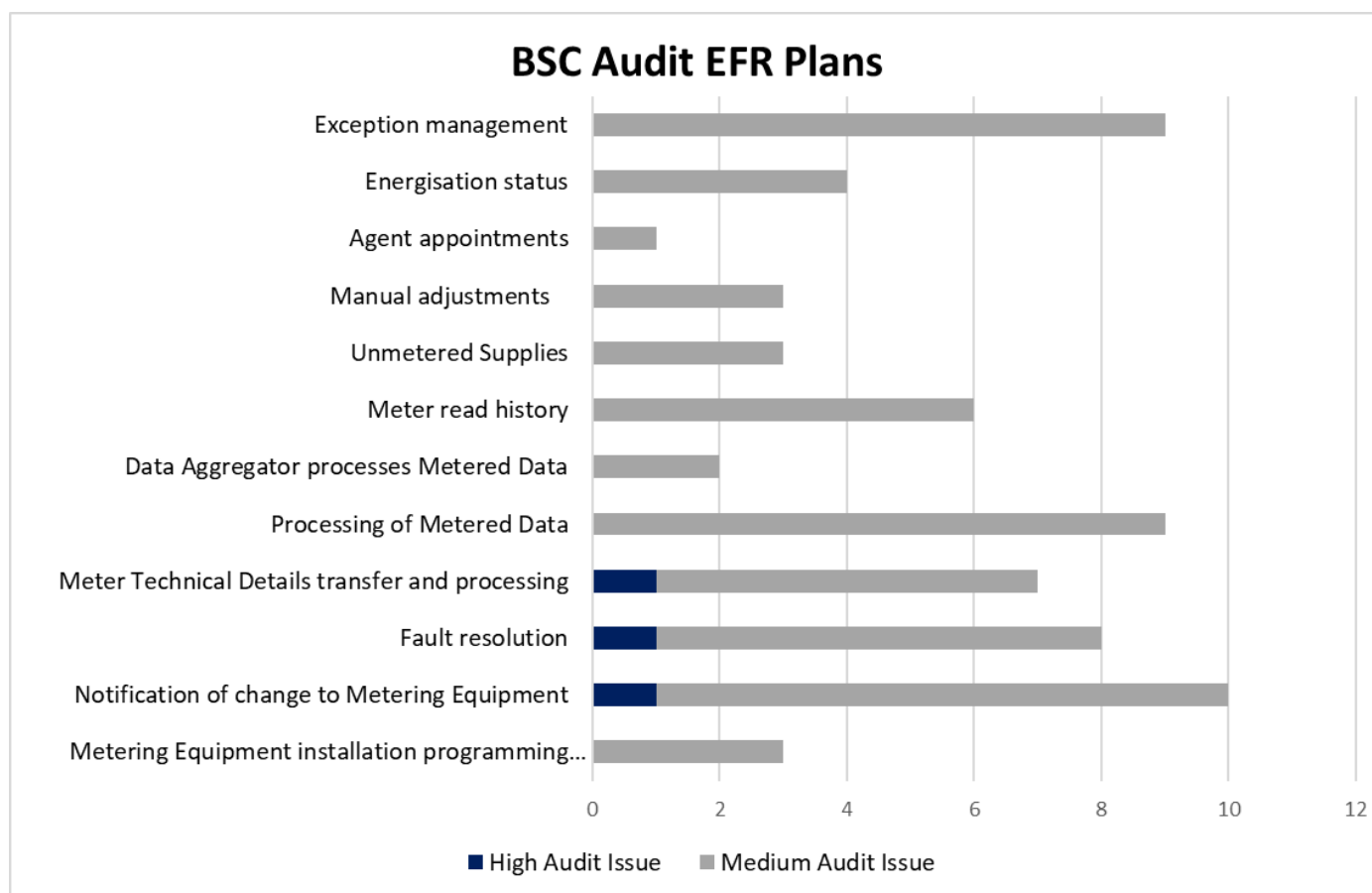
The Error and Failure Resolution (EFR) Technique resumed activities for plans not related to Performance Issues in September 2020, with activities resuming for Performance EFR Plans in November 2020.

This quarter, Elexon has turned off the final EFR plans relating to Risk 3, Metering Equipment, installation, programming, and maintenance, that Elexon had been raised following a Technical Assurance check into the P283 processes.

When Elexon resumed EFR for performance plans in November, it was only applied initially to Suppliers that had been within EFR prior to the pandemic and had a non-compliant volume of estimation over a 2,000MWh threshold. In February, the EFR threshold was increased to 4,000MWh and Elexon considered applying EFR to all Suppliers with a volume of non-compliant estimation over this threshold. Consequently, the number of EFR plans to address the Settlement performance standards has increased from nine to 19. Some Suppliers have one plan to address multiple Supplier IDs or have a combined plan to address Half Hourly Measurement Class C and Half Hourly sub 100kW performance with root cause analysis and actions settings being split out as required within them. For further information please see the details in the [February 2021 performance review paper](#).

Elexon has assessed the results of the Pre-Christmas BSC Audit and has turned on EFR for those BSC Parties that require assistance to improve their performance and compliance in their processes. The number of EFR Plans for High and Medium rated Audit issues are below, showing last year's 58 Audit Issues that are currently being re-assessed and the 7 new Pre-Christmas Audit issues.

Elexon notes that, the Post-Christmas BSC Audit Issues went through moderation on 19th April 2021 and will be finalised during May 2021. This will cause the number of High and Medium Audit issues to change. The PAB will be updated on these changes through the monthly Risk Report.



Technical Assurance Audit

Technical Assurance operations remain limited to Optional Desktop Audits and Optional Central Volume Allocation (CVA) Inspection Visits, in light of COVID-19 restrictions.

Optional Desktop Audits have been used for the Measurement Class E Specific Sample has concluded at the end of January, from the 1st February the Measurement Class C desktops Audits have commenced.

Critical process and system improvements identified at the TAMEG meeting in October 2020 (TAMEG43) were successfully implemented ahead of the commencement of the Measurement Class C Desktop Audit Sample.

The Technical Assurance Agent continues to support Elexons investigations into Annual Demand Ratio through a series of targeted visits at the selected Grid Supply Points.

Supplier Charges

The Supplier Charges Technique remains suspended.

Technical Assurance of Performance Assurance Parties

The Technical Assurance of Performance Assurance Parties (TAPAP) technique is continuing to operate throughout the winter lockdowns, but only where Parties are able to facilitate the checks and with the consideration of prioritising BAU.

Elexon implemented the R11 set of checks as remote audits during the COVID-19 disruption. Initial feedback from Parties is that these have been well received. Elexon noted specific praise that the remote audits provided flexibility that allowed Parties to accommodate their BAU priorities throughout the pandemic and the audit period. A remote audit has always been an option as part of the TAPAP technique but site visits had been mostly used on previous checks. Elexon will continue to provide this as an option for future TAPAPs, to support our Customers and provide a bespoke audit service.

Elexon has now completed all checks that were scheduled for the Risk 11 TAPAP and are finalising individual Party reports. The collated findings report will be reported to the PAB once all of the individual findings have been agreed.

Plans for Next Quarter

Focus on Improving Assurance in the CVA Market

Elexon has committed to providing detailed and regular updates to the market on the status and any issues as they arise within the CVA Market. To support the improved assurance being applied to the CVA Market, Elexon has bought forward the development of Risk Analytic & Monitoring Dashboards for the CVA Market Risks.

Understanding and Mitigating the Impact of any Potential Transition to the REC

Elexon has been liaising with the REC assurance provider to ensure that Elexon is able to respond effectively to the transfer of responsibilities.

Addressing Market Issues identified within the BSC Audit

Elexon will be presenting the Market Issues to the PAB in the first Quarter of the 2021/22 PAOP.