

PUBLIC

# Quarterly Performance Assurance Report

Quarter 2 - 2019/20

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08 Oct 2019

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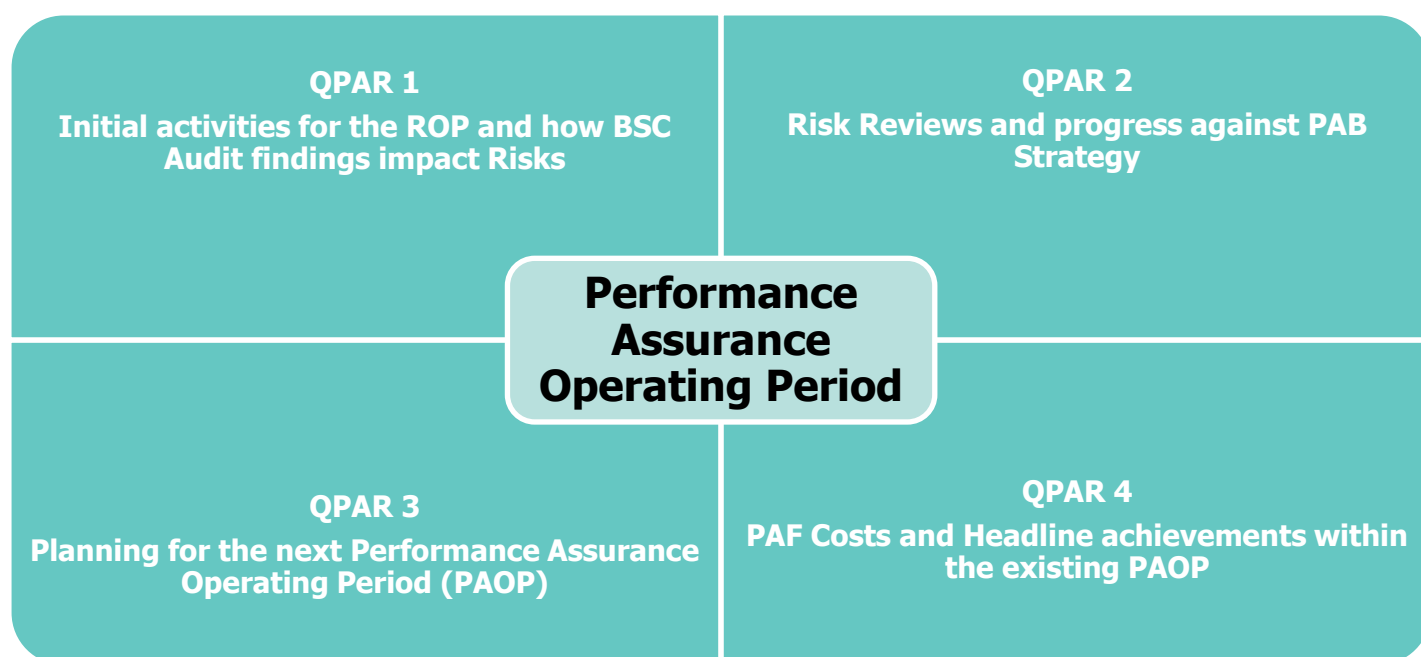
## OVERVIEW

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The Performance Assurance Board (PAB) is required, by Balancing and Settlement Code (BSC) Section Z 8.1<sup>1</sup>, 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 PATs.

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



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

## Key points of progress so far (Risk Management)

- **Considered approach to Technique Deployment**

ELEXON is seeking to review the way in which it responds to third party audit output and recommendations. Our approach to BSC Audit issues was notably changed this year, with a removal of the automatic deployment of EFR (Error and Failure Resolution) for High or Medium rated audit issues. Our adapted approach is to consider each issue in line with the Risk Operating Plan and our focus and priority of risk. ELEXON will use this approach for outputs from BSC Audit and TAA Audits (Technical Audit of Metering).

- **PAB Strategy Session held**

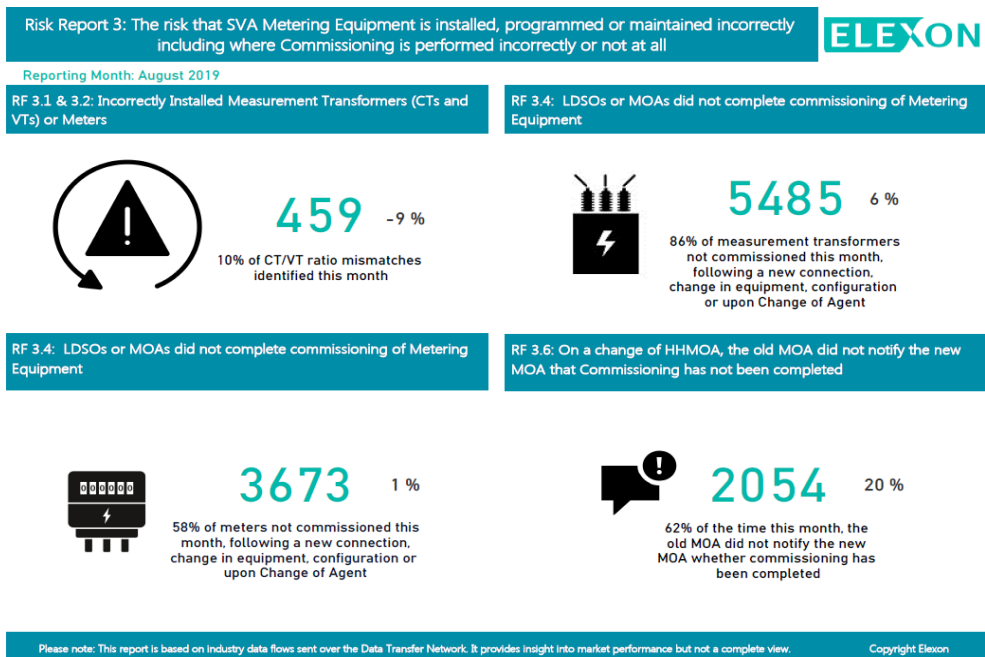
ELEXON hosted a PAB Strategy Day in October 2019, where PAB members were able to discuss strategic objectives and review if any amendments or changes were required, to recognise changes or developments within the SVA and CVA Markets. Outputs from this session will be presented to PAB in December 2019.

- **Internal Review of Disputes process**

The Trading Disputes PAT (Performance Assurance Technique) is out of scope for review within the Performance Assurance Framework Review. ELEXON is carrying out a review of the technique in preparedness for any potential changes raised within the deployment of Market Wide Half Hourly Settlement. The review will look at how the Disputes process works and is deployed and make recommendations for changes to the process, ensuring it is fit for both current and future market states.

- **Initial Risk Reporting designs created and finalised**

The format for Risk Reporting has been internally agreed and the first Risk Report (for Risk 003 – Metering Equipment installation, programming, maintenance and Commissioning) has been completed and presented to the Performance Assurance Board. These reports will be internally managed by Risk Owners, who will use the information to provide guidance and performance information to PAB on their respective risks.

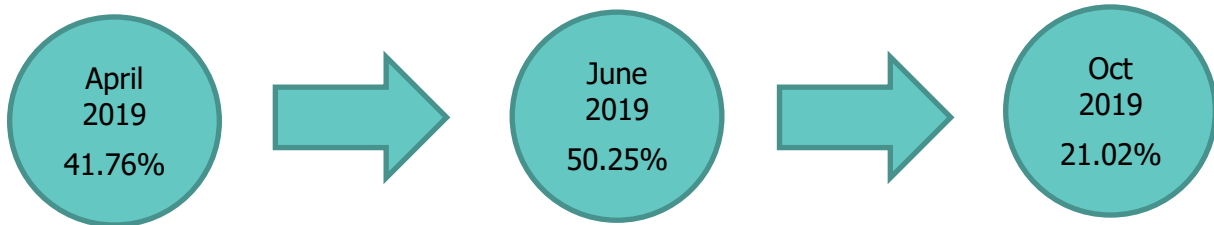


## Risk Landscape

- Our Risk Evaluation Register remains at 34 Risks (18 SVA Risks and 16 CVA)
- We have fully rescored one risk (Risk 027), the calculated risk impact has been adjusted accordingly
- All other risks impacts remain as outlined in the RER 2019/20
- Our view of proposed risks for focus is unchanged and the eight risks identified for focus within the ROP are unchanged.
- We anticipate being able to present movement against targeted impact for the focussed risks in the QPAR 2
- We are currently assessing the impact of Virtual Lead Parties to existing risks, and may require a new additional risk specifically for this issue.

## Key Industry Metrics

### % of Energy in NHH Market Settled to performance standard (97% or higher at RF)



### % of Energy in HH Market Settled to performance standard (Performance at 99% or higher at SF)

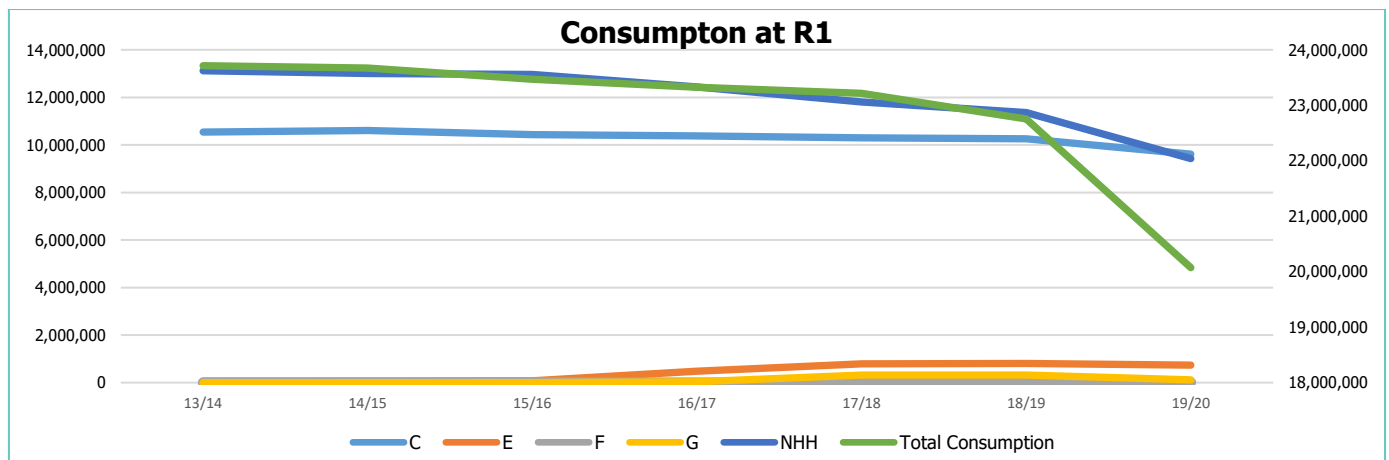
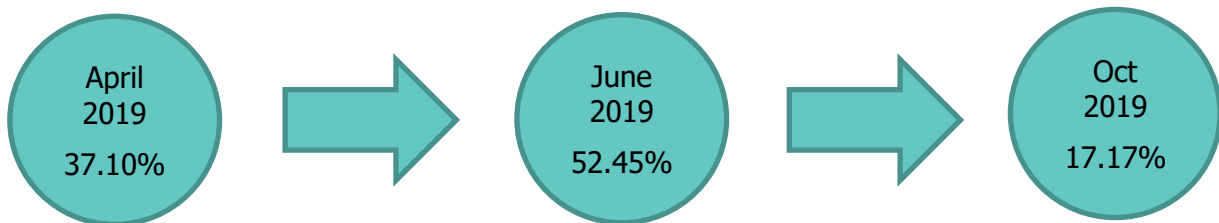


Figure 1: Total Consumption on secondary axis

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## FOCUSSED RISK OVERVIEW

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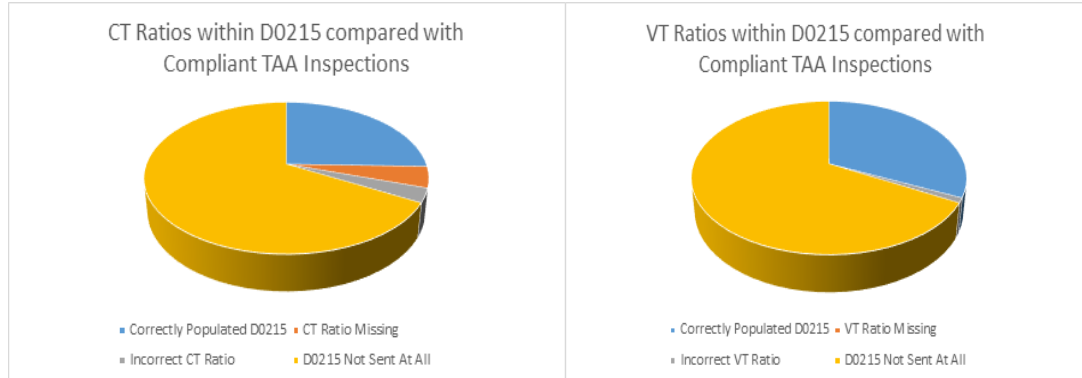
### Risk 003 - Metering Equipment installation, programming, maintenance and Commissioning

#### Risk Owner Update

- The BSC Issue 72 workgroup looking at Commissioning of measurement transformers not owned by a BSC Party (LDSO) has concluded.

The output of the group has provided suggestions for changes to the CoP4 (Certificate of Compliance 4) to ensure that Third party owned Measurement transformers are more effectively commissioned. In addition there has been;

- A change to responsibility for Commissioning of measurement transformers that are to be adopted by LDSO
  - ELEXON are to raise a change to the NERS (ICP accreditation) to reference CoP4 once above changes implemented
- There has been increased training activity around P283/D0383 and D0384 (particularly for IDNOs and Suppliers)
    - Adhoc training developed based on requirements of BSC Party
    - Training requests have increased due to word of mouth from industry on the value of training courses
  - Root cause analysis conducted as to the Settlement impact of poor quality data in the D0215.



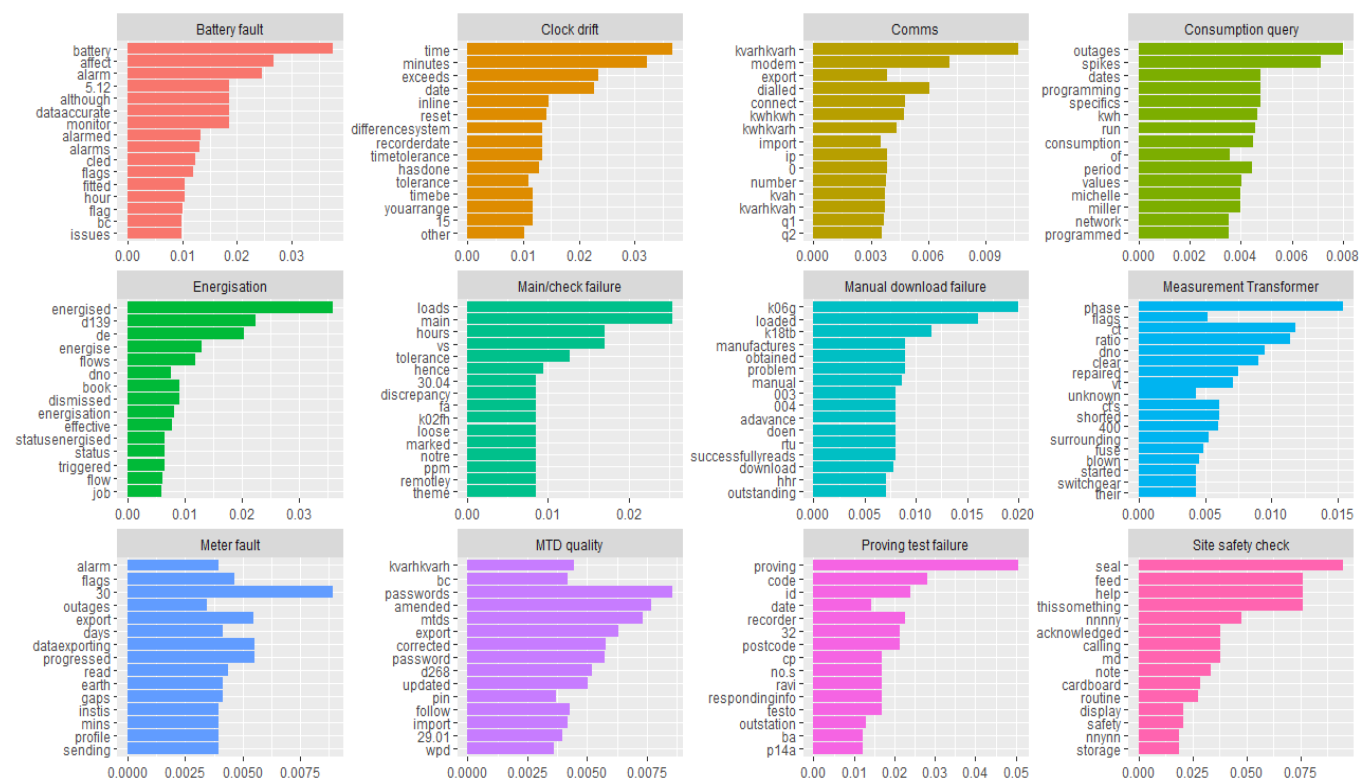
#### Next Steps

- **The launch of reporting** which identifies failures of Risk Factors relating to Risk 003, including Incorrectly Installed Measurement Transformers and Meters, Occasions when the LDSO or MOA did not complete commissioning and when MOA have not correctly provided commissioning information on a Change of Agent event
- **Review of current guidance documentation** on record keeping expectations for Commissioning and sending to Parties via Newscast.

## Risk 005 – SVA Fault Resolution

### Risk Owner Update

- The Risk owner has monitored the initial output from the BSC Issue 73 workgroup which is reviewing the faults process and making changes to improve efficiency. These include;-
  - The creation of bespoke HH fault flows
  - The removal of current timescales for notification of faults; to be replaced with a cyclical process based on projection of date for actual practical progression of faults
  - The creation of new SLAs for fault rectification
    - an addition of "LDSO" fault process to assign faults to LDSOs for Metering Equipment for which they are responsible
  - The creation of fault information transfer process and a COS/COA
- The PAF review team have carried out a Text data mining concept completed to aid with analysis of root cause of faults on data flows with key information held in text fields. An Implementation plan paper to be taken to PAF review board, some initial findings are picture below



### Next Steps

- Developing reporting** which monitors fault investigations to ensure all parties are aware of any outstanding faults requiring resolution.
- Trial Peer Comparison** of the reporting in order to drive better performance at Parties and Party Agents.

## Risk 007 – Retrieval of Metered Data

The Risk owner provided an update to PAB in September 2019 to discuss performance improvements in Measurement Classes E, F and G across the market.

PAB were presented with the table below highlighting changes amongst key monitored parties and how the performance improvements have impacted industry.

Supplier	February Performance	Current Performance	Improvement
Supplier A MC F and G	92.91% - Was second biggest negative impact on industry performance	95.99% - Now third biggest negative impact on industry performance	+3.08%
Supplier A MC E	94.91% - Was third biggest negative impact on industry performance	96.33% - Now second biggest negative impact on industry performance	+1.42%
Supplier B MC F and G	81.53% - Was biggest negative impact on industry performance	93.86% - Now second biggest negative impact on industry performance	+12.33%
Supplier B MC E	89.88% - Was biggest negative impact on industry performance	95.73% - Now third biggest negative impact on industry performance	+5.85%
Supplier C MC F and G	92.47% - Was third biggest negative impact on industry performance	93.52% - Now biggest negative impact on industry performance	+1.05%
Supplier C MC E	92.38% - Was second biggest negative impact on industry performance	93.58% - Now biggest negative impact on industry performance	+1.20%

The PAB have agreed to carry out the following monitoring in the coming months

- Suppliers with a monthly volume of energy of 500 MWh + in MC E or MC F and G asked to discuss clearance plan for the backlog of these sites
- This plan should ensure that Meter issues are fixed, or a regular manual read collection plan is put in place
- ELEXON will provide reporting to Suppliers on its MC F and G performance at R1 as the 99% standard will be required to be met at this Settlement Run from the beginning of 2020
- ELEXON recommends that the next update on sub-100 kWh performance is provided to the PAB at its February 2020 meeting when aggregated R1 data available
- ELEXON will carefully monitor Supplier C's performance and, if required, recommend EFR is applied in a future confidential TPR.

### Next Steps

- **Create Risk Owner and Customer Reporting for Risk 007**



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## Risk 011 – Unmetered Supplies

In the previous QPAR update, the Risk Owner highlighted the currently weak visibility of UMS data, which is one of the main reasons Risk 11 became a focus risk. Over the last few months, I have begun seeking alternatives for accessing UMS data, while also raising awareness of the risk with industry members related to UMS, such as UMSOs and MAs.

At the end of August, ELEXON hosted an UMSUG meeting where a presentation was delivered on Risk 11. This involved explaining to UMSUG members what Risk 11 is, how it has been scored, what the currently identified issues are, and general information on the PAF review.

Information was also provided on the TAPAP PAT, which ELEXON plan to utilise to gain better clarity into the UMSO process. The UMS TAPAP will help ELEXON re-assess risk impact more accurately and review BSCP obligations and processes. The presentation were well received by UMSUG members who were keen to cooperate.

In depth conversations with industry members during the UMSUG meeting have helped shape ELEXON's approach to devising an RFI (Request for Information) and TAPAP.

Following on from the UMSUG meeting, at the beginning of September, the RFI was sent to all UMSOs, to obtain information UMSOs held on MPANs such as:

- When inventories and EACs were last updated
- HH/NHH designation for MPANs
- References to error identified on the MEM reports they receive
- General notes/information they keep on inventories
- Documentation on processes and procedures

Seven of the UMSOs contacted provided a response. Some findings from the RFI included:

- **Mismatches between inventory and EAC updates**
  - Inventories are being updated, but no updates being made to the EAC
    - Some of these mismatches are years apart
- **A large amount of MPANs have not had an update to the inventory/EAC in over 2 years**
  - One DNO had ~6700 MPANs, ~5800 haven't been updated since the end of 2017
- **Many MPANs have error associated with them** (identified from the MEM), but no updates have been made to the EAC for years despite this
- **Many EAC's at 0, but don't appear to have been de-energised**
- **Some NHH MPANs have large EACs which should arguably be settled HH**

These findings have helped to shape the scope of a TAPAP, which ELEXON are aiming to conduct in February 2020. PAB will have the opportunity to comment on the proposed TAPAP scope at November's PAB meeting.

### Next Steps

- **Continue preparations for TAPAP Check**

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## Risk 016 – Energisation Status

### Next Steps

- **Reviewing MEM provision** - to improve engagement and scope of reporting
- **Conduct Site visits** – working with BSC Auditor to explore the management of controls for Energisation Status

## Risk 021 – CVA Retrieval of Metered Data

As part of [Issue 80](#), in relation to the 'not retrieved' aspect of Risk 021, ELEXON contacted the Central Data Collection Agent (CDCA) to confirm if it had any issues with Outstations overwriting metered data due to prolonged dial faults (no comms), resulting in estimates for missing data being used in Settlement. The CDCA confirmed it always manages to get metered data off CVA Outstations before it gets overwritten by either getting metered data from the Registrant, its Meter Operator Agent or by it carrying out hand held reads on site.

## Risk 023 – A fault with CVA Metering Equipment is not resolved, such that metered data is recorded incorrectly or cannot be retrieved

In the Q1 QPAR, ELEXON identified a Trading Dispute related to Risk 020, with a materiality of c£5m. The Trading Dispute was also linked to Risk 023. The Trading Dispute was notified to the PAB by the Trading Disputes Committee (TDC). ELEXON proposes to conduct a lessons learned (under TDC's authority) to identify the root causes behind the Trading Dispute and will discuss potential solutions at Risk Evaluation Working Group (REWG) before presenting solutions to mitigate the '**not resolved**' aspect of this Risk, to the TDC/PAB.

### Next Steps

- **Update PAB** – on existing CVA processes and performance

## Risk 018 – Revenue Protection

### Risk Owner Update

The Risk Owner has been cooperating with ElectraLink in its role as the Theft Risk Assessment Service administrator, to gain access to the identified theft report, published to suppliers on a monthly basis. The Risk Owner has provided Change requests and impact assessments for their submission to the DCUSA panel.

The Risk Owner is preparing to develop an Identified Theft Reconciliation Report which would establish all cases of identified theft and if they are settled correctly as required in BSCP504 3.6.

ELEXON has proposed a potential report to Electralink, the identified theft reconciliation report. The report would review the TRAS information sent to suppliers, against the consumption of any identified MPANs, reconcile any difference and report this to the Suppliers.

ELEXON has been coordinating a Change request with Electralink and has submitted a Data Protection Impact Assessment and a DCUSA Change Request to the Theft Issue Group (TIG) in August 2019. The TIG requested ELEXON to attend in September 2019 to provide further information. The RO attended and provided the rationale and technical details of the proposed reporting.

The Change request is progressing through the DCUSA Change Process. The request is for previously submitted TRAS data from April 2016 onwards, as well as monthly TRAS outcome files sent to suppliers. ELEXON has specifically requested the following data items, and provided a rationale for the request

Data Block	Field Name	Rationale
Supply Block	MPAN / MPRN	Used as an identifier to match between records
Meter Block	Meter Serial Number	Used as an identifier and validation to match between records
Investigation Outcome Block	Supplier Investigation ID No	Used as an identifier to match between records
	Theft lead source	to understand trends in theft for scoring
	Date Investigation Closed	support data flow matching
	Current investigation code	to understand trends in theft for scoring
	Type of theft	to understand trends in theft for scoring
	Assessed start date for theft	vital to match affected start date for reconciliation
	Assessed end date for theft	vital to match affected end date for reconciliation
	Assessed losses	vital to match the total volume of affected theft for reconciliation
	Tampering Code	to assess the methods of theft
	Tampering Report Date	to understand the periods for which theft is not reported
	Tampering Report Source	to assess the methods of theft reporting
	Security devices fitted	to understand the mitigation controls applied following theft identification

### Next Steps

- **Monitor and assist DCUSA** in successfully completing the Change Process for access to this data
- **Produce a prototype identified theft reconciliation report** – working with BSC Auditor to explore the management of controls for Energisation Status
- **Utilise the historic TRAS data in its evaluation for Risk 018** to produce a much refined assessment of the impact of the excluding Revenue Protection volumes from settlement across the industry.

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## OTHER NOTABLE RISK UPDATES

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### **Risk 020 – CVA Metering Equipment is installed, programmed or maintained incorrectly including where Commissioning is performed incorrectly or not at all**

In the Q1 QPAR, ELEXON identified a Trading Dispute related to Risk 020 with a materiality of c£5m. The Trading Dispute was notified to the PAB by the Trading Disputes Committee (TDC). ELEXON proposes to conduct a lessons learned (under TDC's authority) to identify the root causes behind the Trading Dispute and will discuss potential solutions at the Risk Evaluation Working Group (REWG) before presenting solutions to mitigate the '**maintained incorrectly**' aspect of this Risk, to the TDC/PAB. The Trading Dispute also related to Risk 023 so a similar update is provided under Risk 023.

In relation to the '**Commissioning is performed incorrectly or not at all**' aspect of Risk 020 in May 2018 ELEXON instigated a post-energisation check for new circuits (i.e. new circuits at a new site and additional circuits at an existing site) and for SVA to CVA registration transfers. This new process involves the Central Data Collection Agent (CDCA) checking the metered data for these new (or post transfer) circuits each month to identify when energy flows (Imports or Exports) are occurring. The CDCA then submits a sample of Half Hourly data from each channel of the Outstation(s) to the Registrant and asks the Registrant to confirm, using with an independent measurement source (e.g. Substation Control System (SCS) or Supervisory Control and Data Acquisition (SCADA) data), that the Settlement Metering System is recording energy in the correct direction and with the same order of magnitude. Since May 2018 this process has identified one issue (incorrect direction of energy flow due to reversed wiring) out of 26 (completed) newly registered sites (covering 34 MSIDs) and 0 issues out of 0 (completed) registration transfers for sites. There are 14 'sites' still to be completed covering 19 MSIDs and three SVA to CVA transfers.

The Risk Owner proposes to now formalise this post-energisation/registration transfer check in BSCP02 'Proving Test Requirements for Central Volume Allocation Metering Systems' through a Change Proposal (CP). As part of the CP we also propose to extend this check to other scenarios in BSCP02 where no 'end-to-end' commissioning takes place when individual items of Metering Equipment on existing circuits are changed and commissioned 'in isolation' from the rest of the Metering System (e.g. the current transformers (CTs) and/or voltage transformers (VTs) on a CoP2, CoP3 or CoP5 site (i.e. for non-duplicate Metering Systems) or where both sets of CTs and/or VTs are changed on a CoP1 Metering System (a duplicate Metering System)).

#### **Next Steps**

- **Progress CP** for Proving Test requirements and update Risk accordingly

### **Risk 004 - The risk that changes to Metering Equipment are not notified, such that all members of the Supplier Hub do not use the correct Meter Technical Details**

The Risk Owner has noted continued under-performance in respect of the transfer of MTDs following SMETS1 and SMETS2 installs. Performance in respect of SMETS2 installs is generally better but there are a number of outliers. While many Supplier Agents' performance has improved since ELEXON published TAPAP audit [report on Late and Missing Smart MTDs](#) on 28 February 2019, a number of agents' performance has remained poor or worsened. The tables below highlight this under performance.

The Risk Owner has refreshed ELEXON's formal estimate of the materiality of Risk 004 based on the latest available data as of the October 2019 QPAR. The revised materiality estimate for Risk 004 is provided below alongside the original estimate:

Market	Original Estimate			Revised October 2019		
	Lower	Middle	Upper	Lower	Middle	Upper
NHH	£2.1m	£6.1m	£15.7m	£1.5m	£4.5m	£12.1m
HH	£795.3k	£1.6m	£3.7m	£676.4k	£1.4m	£4.0m

Cont...

SMETS1 Installs from June 2019 to September 2019:

MOA	Meter_Group	Total_MEX	Total_late	Pct_late	SF_to_R1	R1_to_R2	R2_to_R3	R3_to_RF	After_RF
BGAS	SMETS1	57334	6874	11.99%	6731	143	0	0	0
EMEB	SMETS1	23981	55	0.23%	19	34	1	1	0
UMOL	SMETS1	23716	56	0.24%	36	20	0	0	0
IHTL	SMETS1	13584	160	1.18%	110	49	1	0	0
MORR	SMETS1	12984	12	0.09%	2	10	0	0	0
SOUT	SMETS1	12068	97	0.80%	55	42	0	0	0
BMSL	SMETS1	7726	513	6.64%	494	19	0	0	0
UPLD	SMETS1	7188	125	1.74%	75	47	3	0	0
EMSL	SMETS1	3222	30	0.93%	18	8	0	0	4
CHFM	SMETS1	2303	60	2.61%	41	19	0	0	0
HYDE	SMETS1	1517	10	0.66%	5	5	0	0	0
AESM	SMETS1	1191	69	5.79%	62	7	0	0	0
SSSG	SMETS1	1146	2	0.17%	2	0	0	0	0
FUML	SMETS1	1020	67	6.57%	24	43	0	0	0
MIDE	SMETS1	884	4	0.45%	1	3	0	0	0
NORW	SMETS1	792	17	2.15%	10	6	0	1	0
YELG	SMETS1	785	39	4.97%	19	20	0	0	0
FMSL	SMETS1	742	0	0.00%	0	0	0	0	0
DEML	SMETS1	459	102	22.22%	102	0	0	0	0
LOND	SMETS1	448	25	5.58%	8	16	1	0	0
SWEB	SMETS1	237	0	0.00%	0	0	0	0	0
NEEB	SMETS1	219	8	3.65%	6	2	0	0	0
LBSL	SMETS1	162	20	12.35%	11	9	0	0	0
ACCU	SMETS1	87	2	2.30%	2	0	0	0	0

SMETS1 Installs from June 2019 to September 2019:

MOA	Meter_Group	Total_MEX	Total_late	Pct_late	SF_to_R1	R1_to_R2	R2_to_R3	R3_to_RF	After_RF
LOND	SMETS2	88529	2665	3.01%	2356	305	1	0	3
BGAS	SMETS2	88196	749	0.85%	657	91	1	0	0
EMEB	SMETS2	74798	54	0.07%	33	21	0	0	0
SOUT	SMETS2	49773	480	0.96%	335	143	2	0	0
UPLD	SMETS2	45978	319	0.69%	199	115	5	0	0
SIEM	SMETS2	40308	244	0.61%	132	112	0	0	0
MORR	SMETS2	35451	51	0.14%	16	35	0	0	0
LBSL	SMETS2	32809	82	0.25%	48	34	0	0	0
YELG	SMETS2	31332	1023	3.27%	927	96	0	0	0
IHTL	SMETS2	24101	43	0.18%	32	10	0	0	1
SEEB	SMETS2	19954	450	2.26%	387	62	0	0	1
SSSG	SMETS2	15573	15	0.10%	15	0	0	0	0
CHFM	SMETS2	12318	198	1.61%	162	36	0	0	0
BMSL	SMETS2	12099	428	3.54%	413	15	0	0	0
MIDE	SMETS2	10659	1	0.01%	0	1	0	0	0
HYDE	SMETS2	4574	37	0.81%	31	6	0	0	0

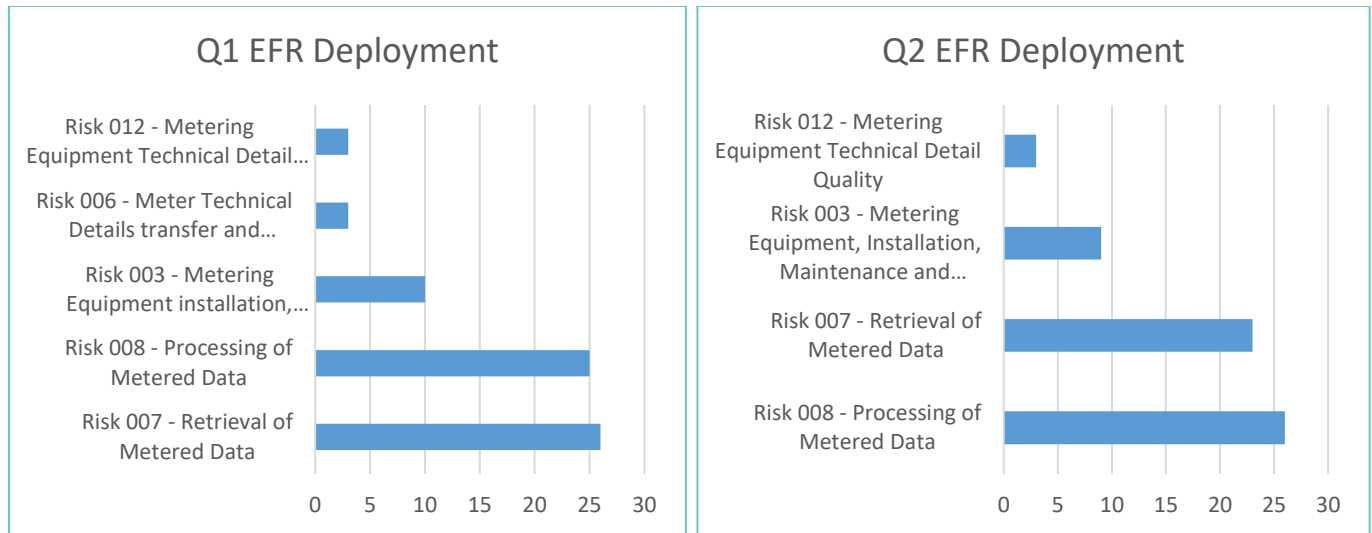
EMSL	SMETS2	3106	43	1.38%	37	4	0	0	2
AESM	SMETS2	2989	126	4.22%	104	22	0	0	0
NEEB	SMETS2	2439	18	0.74%	14	4	0	0	0
UKDC	SMETS2	2221	238	10.72%	117	121	0	0	0
DMSL	SMETS2	680	57	8.38%	52	5	0	0	0
SWEB	SMETS2	390	0	0.00%	0	0	0	0	0
DEML	SMETS2	190	7	3.68%	7	0	0	0	0
MMSL	SMETS2	91	2	2.20%	2	0	0	0	0
BMET	SMETS2	50	1	2.00%	1	0	0	0	0
NORW	SMETS2	48	9	18.75%	6	3	0	0	0
LMSL	SMETS2	6	1	16.67%	1	0	0	0	0

### Next Steps

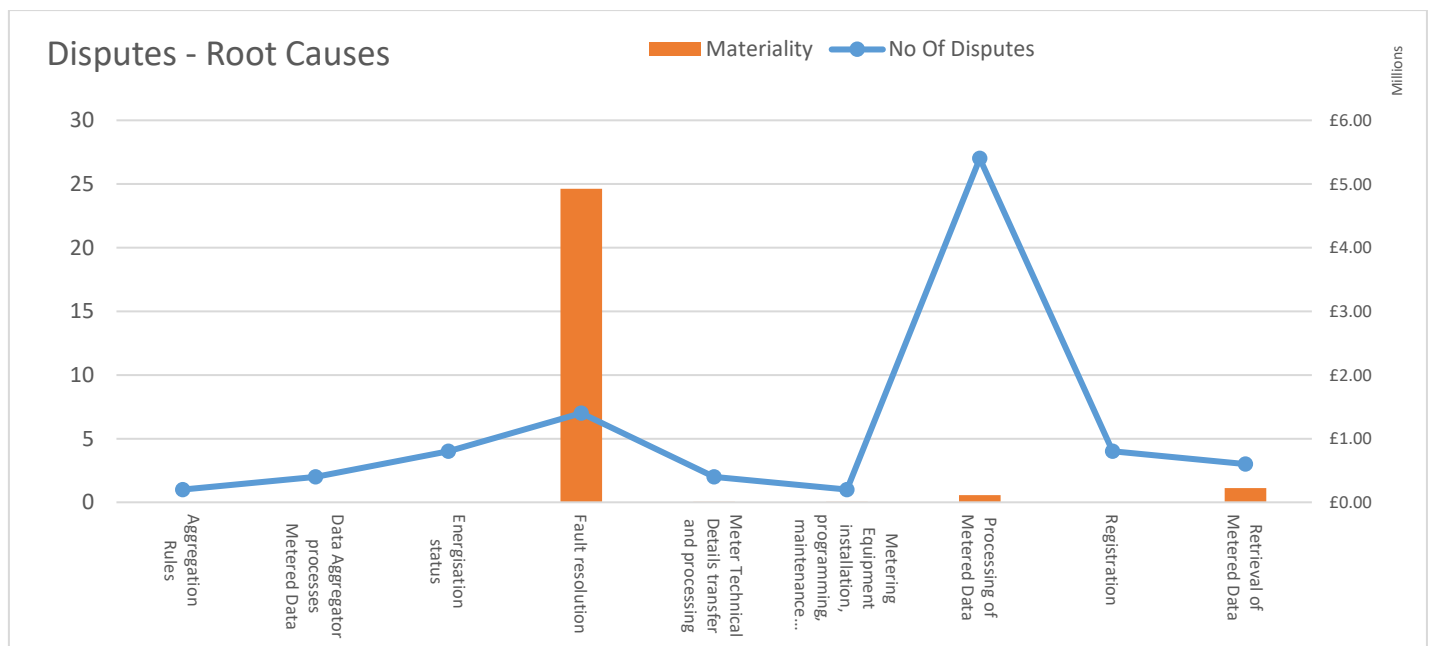
- **Engage lead analyst for the BSC Audit** and confirm that all but three of the MPIDs included within the tables above will be subject to NHHMOA audits in the 2019/20 audit cycle. The three MPIDs which will not be audited were DEML, FMSL and FURL due to their being significantly below the BSC Audit MPAN threshold for Proving Test requirements and update Risk accordingly
- **All audited MPIDs will have testing undertaken** over the transfer of MTDs following installs. The risk owner will be providing performance information and samples of late MTDs to the BSC Auditor to ensure that this performance is challenged and thoroughly investigated.

## TECHNIQUE UPDATES

### EFR



### Disputes



## Qualification

### SVA Qualification and re-Qualification

SVA Qualification process and re-Qualification are preventative techniques used by the PAB to manage Settlement risks. The Qualification process provides assurance that new entrants have developed their systems and processes according to the standards defined in the BSC and its subsidiary documents. The re-Qualification process provides assurance that existing Party Agents remain compliant when making major changes to their systems and processes.

During the period July 2019 – October 2019, the PAB considered and approved 11 role-specific Qualification applications and 5 re-Qualification applications. Further details are shown in the table below. 8 of the Suppliers Qualified were brought through by consultancies as 'off the shelf' Suppliers.

Role	Qualification	Re-Qualification
SMRA	1	0
UMSO	1	3
HHDC	0	0
NHHDC	0	1
HHDA	0	0
NHHDA	0	0
HHMOA	0	0
NHHMOA	0	1
CVAMOA	0	0
HH Supplier	5	n/a
NHH Supplier	5	n/a
MA	0	0
VLP	0	n/a
<b>Total</b>	<b>11</b>	<b>5</b>

### PAF Review of Qualification and re-Qualification

The PAF Review of the Qualification and re-Qualification techniques resulted in the below recommendations, which were approved by the PAB in September 2019. ELEXON will be working to implement these recommendations through the Change process. The expectation is to implement any Modifications and Change Proposals in approximately 18 months.

- LDSO (including IDNO) subject to Qualification.
- Reworded Annual Statements – inclusion of upcoming changes and party size / risk profile.
- Single assessment of managed service provider's systems and processes.
- Qualification Check focusing on staff and processes after a change of ownership has occurred.
- Update Self-Assessment Document (SAD) questions and storyboards scenarios, and maintain them as category 3 configurable items.
- Track participant size and early run performance.
- Replacement of Re-Qualification with "Maintenance of Qualification"



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## PLANS FOR THE NEXT QUARTER

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- **An update to the PAB Strategy**

Following strategy workshop in October 2019, ELEXON will incorporate issues and amendments suggested to the existing PAB Strategy to ensure it is fit for purpose and reflects the PAB aims for the coming PAOP

- **Risk Operating Plan preparation**

ELEXON will co-ordinate feedback from Technique Owners and Risk Owners to create an Operating plan for the 2020/2021 PAOP. ELEXON will use the PAB strategy (inclusive of any amendments and updates) to underpin any PAA activities planned within the year.

- **Risk Re-Scoring**

All Risk Owners will be considering re-scoring of risks, as outlined within the Risk Operating Plan, to ensure reviews take place as agreed. Re-scored risks will be presented to PAB for review and approval

- **Performance Assurance Technique Reviews**

PAT Reviews will continue throughout the quarter, and, in addition to reviews taking place as part of the PAF review, we will begin internal reviews into both the Education and Trading Disputes Techniques