

# QUARTERLY REPORT Q3 2014/15: OCTOBER TO DECEMBER 2014

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The ELEXON Quarterly Report for Q3 2014/15 provides information on the operation, implementation and administration of the BSC, in accordance with [section C3.9.1 of the BSC](#).

The Quarterly Report is divided into four sections:

1. BSCCo Review
2. Operation of the Balancing and Settlement Arrangements
3. Governance and Change
4. Review against the Annual Budget

## BSCCO REVIEW

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This report summarises the operation of the Balancing and Settlement Code (BSC) for the third quarter of the financial year 2014/15, and describes the activities of the BSC Panel and its Committees. The report also reviews ELEXON's performance against the BSCCo Business Strategy and Budget for 2014/15.

Our strategy this year is to maintain and build upon our previous achievements to fulfil our mission – 'To deliver the BSC effectively, efficiently and economically, to the benefit of our customers', and to support the best strategic outcomes for the evolving industry by pursuing our vision – 'to be a leader in the efficient transformation of energy markets by providing shared solutions to address common industry problems.'

We aim to achieve our strategy by fulfilling five strategic priorities designed to improve our service to our customers and stakeholders. These are to:

- Actively managing and continually improving BSC services to ensure efficient, effective and economic delivery (Delivering our core service)
- Driving efficiencies and savings in our operational business (Driving efficiencies)
- Improving the customer experience and developing better customer relationships (Improving the customer experience)
- Developing our services and adapting our business to address industry challenges (Addressing industry challenges)
- Investing in our people for the benefit of our industry (Investing in our people)

To pursue our vision, we will develop our services and adapt our business to address industry challenges.

We've highlighted some of the key successes below, but you can get a fuller picture of our business activity from the reports presented at each BSC Panel meeting:

- [ELEXON Report 229 – 14 September to 1 October](#)
- [ELEXON Report 230 – 10 October to 5 November](#)
- [ELEXON Report 231 – 14 November to 4 December](#)
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## Managing and improving BSC services

### Mark Bygraves appointed as ELEXON's Interim Chief Executive Officer (CEO)

Mark Bygraves, formerly ELEXON's Director of Strategy & Development, was appointed as ELEXON's CEO, taking over from Peter Haigh on an interim basis on Monday 1 December 2014. Mark will remain in post while the Board seeks a permanent replacement.

### Increase in the Credit Assessment Price (CAP) to £55/MWh

On 23 October 2014 and following consultation with Trading Parties, the Credit Committee increased the CAP to £55/MWh. The CAP is used to calculate Trading Parties' Credit Cover Percentage.

### System Releases

During this quarter, there were two system releases:

- November 2014
  - The November 2014 BSC Systems Release was implemented on Thursday 6 November 2014. There were changes to Party Agent software and new versions of BSC Sections, Code Subsidiary Documents (CSDs) and Configurable Items.
- December 2014 Special Release
  - This Release included Modifications P291: REMIT Inside Information Reporting Platform for GB Electricity and P295: Submission and publication of Transparency regulation data via the BMRS and a new mechanism for data retrieval. P291 and P295 were effective on Wednesday 31 December 2014 and Tuesday 16 December 2014 respectively.

### Balancing Mechanism Reporting Service (BMRS) Application Programming Interfaces (API)

In December, the Balancing Mechanism Reporting Service (BMRS) website published Transparency Regulation data received from National Grid (for P295: Submission and publication of Transparency regulation data via the BMRS) and data received from participants (submitted via National Grid or the ELEXON Portal) relating to Regulation on Wholesale Energy Markets Integrity and Transparency (REMIT) data (for P291: REMIT Inside Information Reporting Platform for GB Electricity).

REMIT and Transparency related data was also published on a new BMRS platform. With the new platform, we introduced a set of Representational State Transfer (REST) Application Programming Interfaces (API) to allow our customers to retrieve BMRS data.

We published a draft API user guide, which helped people to use the API, and access the Transparency and REMIT data. More information can be found on the [BMRS page](#) of our website.

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## System Price Parameters

We reviewed three areas of the System Price calculations and no changes were made during this quarter.

- Market index Definition Statement 2014 annual review
  - Following industry consultation and the Imbalance Settlement Group (ISG) recommendations, the BSC Panel decided not to make any change to the current MIDS.
- Continuous Acceptance Duration Limit 2014 review
  - At its September 2014 meeting, the ISG recommended to the BSC Panel that no change should be made to the CADL. The BSC Panel agreed not to change the parameter at its October 2014 meeting.
- De Minimis Acceptance Threshold 2014 review
  - At its September meeting, the ISG recommended that no change should be made to the DMAT. At its October meeting, the BSC Panel agreed not to change the DMAT parameter and recommended that the P305 Modification Workgroup should consider the DMAT role.

## Risk Operating Plan (ROP) 2015/16

In October 2014, the Performance Assurance Board (PAB) endorsed the [Risk Operating Plan \(ROP\) 2015/16](#) for industry consultation, and we published it for consultation on Friday 31 October 2014.

We asked for views on the deployment and scope of Performance Assurance Techniques (PATs) and asked for suggestions on other areas of the Performance Assurance Framework or specific PATs that could be reviewed to improve efficiency and effectiveness.

We presented the consultation responses to the PAB at its meeting on Thursday 18 December 2014. At this meeting, the PAB, with delegated authority from the BSC Panel, approved the ROP 2015/16.

## Improving the customer experience

### Technical Assurance of Metering (TAM) education day

On Wednesday 29 October 2014, we held a Technical Assurance of Metering (TAM) education day where Licensed Distribution Systems Operators, Suppliers, and Meter Operator Agents (Central Volume Allocation and Supplier Volume Allocation) learnt more about the current market issues and recommendations to address these issues. We also provided training on the Technical Assurance of Metering Systems along with a debrief of individual performance following the annual reports which were sent to Parties following the 2013/14 audit year.

The Technical Assurance of Metering Systems is designed to detect and correct errors in the setup of half hourly (HH) Metering Systems. The Technical Assurance Agent (TAA) does this as a BSC Agent, appointed by ELEXON, to deliver inspections of a Metering System on a sample of the Metering System population.

### 'Introducing ELEXON' seminars

We held an 'Introducing ELEXON' seminar in November, which was fully booked, and we received excellent feedback. The next seminar in February is already fully booked.

### Open forum held on our services

In December, we held two open forums for customers to provide feedback on how we should evolve as an organisation.

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## Switched On: Results of our customer survey

In December, we published the results of our annual [customer survey](#). Over the past five years, ELEXON has sustained a consistently high level of satisfaction and perceived value for money has reached a new peak.

## Developing our services

### European Developments

The European Electricity Balancing Network Code is the piece of European legislation that is likely to have a significant impact on the BSC arrangements over time. ENTSO-E, the body representing European Transmission System Operators, published [a revised draft of this Code](#) just before the Quarter began. ACER<sup>1</sup> then began its review process and issued a [Call for comments on the revised Network Code on Electricity Balancing](#) in December, to which ELEXON responded.

ENTSO-E also published a draft of the [European Network Code on Emergency and Restoration](#), in October for public consultation; and again in December, on [the market aspects of the Emergency and Restoration Network Code](#). As this Network Code may interact with the BSC Contingency provisions, e.g. for Black Start, ELEXON submitted responses to both.

At the Joint European Standing Group (JESG) meeting in December, Ofgem noted that there was increasing discussion with other regulators as to whether a harmonised Imbalance Settlement Period duration of 15 minutes should be set in the Electricity Balancing Network Code.

A number of other European consultations were issued before Christmas including a [joint ACER/ENTSO-E consultation on stakeholder involvement in the ongoing governance of the European Network Codes](#); and an Ofgem consultation on [implementation of the Network Codes and in particular the Capacity Allocation and Congestion Management \(CACM\) Network Code](#).

All our consultation responses referred to above can be found on the [Industry Insights](#) section of ELEXON website.

## Electricity Market Reform (EMR)

### Changes to the BSC

In November 2014, DECC published a consultation on further changes to the BSC to support the implementation of the Electricity Intensive Industries (EII) exemption from CFD costs. DECC are now considering consulting on two sets of BSC changes. Option 1 would require EII metered volumes to be captured using Additional BM Units. Option 2 would require EII metered volumes to be provided by Half Hourly Data Aggregators (HHDA) to the Settlement Services Provider. Option 2 would effectively extend the scope of the HHDA metering solution that was approved as part of the BSC changes directed for EMR in August 2014.

### Reserve payment notices to all licensed electricity suppliers

We issued reserve payment notices to all licensed electricity suppliers. This detailed the suppliers' reserve payment amount and the interim levy rate for the first quarterly obligation period, which covers 1 April 2015 to 30 June 2015.

A licensed electricity supplier must pay its share of the Total Reserve Amount in accordance with The Contracts for Difference (Electricity Supplier Obligations) Regulations 2014.

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<sup>1</sup> Agency for the Cooperation of Energy Regulators

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## CFD Reserve Payment

We also published the [CFD Reserve Payment guidance](#). The guidance includes:

- How will my reserve payment be calculated?
- When are reserve payments due?
- How are reserve payments reconciled?

## Consultation on the proposed approach to calculating supplier demand for EMR charging

On 16 October 2014, we published a consultation on the proposed approach to calculating supplier demand for EMR charging. This consultation, of interest to Suppliers, looked at which Balancing Mechanism (BM) Unit data is used to calculate the total demand for each electricity supplier, to calculate charges payable under the Contracts for Difference (CFD) (Electricity Supplier Obligations) Regulations 2014 and the Electricity Capacity (Supplier Payment) Regulations 2014 (subject to being laid before Parliament).

## EMR System Implementation

During this quarter, implementation of the EMR settlement system progressed in accordance with the agreed plan with Steria. The first operational process, the CM Interim Credit Cover process went live on 3 October 2014 when the CM prequalification results were announced.

The second release of the EMR settlement system was successfully delivered on 28 November and the second phase of System Integration Testing (SIT) began at the beginning of December.

## Other Stakeholder Engagement activities

To keep our stakeholders informed of our activities in the EMR Programme during the quarter, we held a number of successful events. They included:

### CFD Supplier Implementation event

At a CFD Supplier Implementation event in October, we provided an update on the implementation of the EMR settlement system and the likely impact of DECC's proposed changes to the CFD Supplier Obligation on EMR Settlement, and our approach to the sending of the first reserve fund amount to Suppliers.

### Suppliers journey through CFD and Capacity Market (CM)

On Tuesday 25 November 2014, the Low Carbon Contracts Company (LCCC) and the EMR Settlement Services Provider held a supplier-focussed event to support in their preparations for the Electricity Market Reform (EMR) Contracts for Difference (CFD) and Capacity Market (CM).

The event covered the following areas:

- CDF and CM Supplier payments
- Reserve Fund calculations, payments and reconciliation
- CFD Credit Cover requirements and reporting
- Interfaces

All of our event material has been published on the [EMR Settlement website](#).

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## EMR Circulars

We issued 11 EMR Circulars over the quarter via the [EMR website](#).

## Smart Metering and Smarter Markets

We continued to provide expert support to Ofgem's Smarter Markets work streams.

On Settlement review we shared our work under the Profiling Settlement review to reduce settlement timescales from 14 months down to seven. We also contributed to the work on Half Hourly settlement and options for centralised data collection and aggregation services.

We concluded our joint report with other code administrators on improving data quality for the consumer switching process. The BSC Panel and MRA executive committee signed off the final report and we issued this to Ofgem.

In addition, we continued to support Ofgem's Change of Supplier (CoS) and Demand Side Response work.

We meet regularly with the Data and Communications Company (DCC) and the Smart Energy Code (SEC) Panel chair to share relevant information about smart meter developments and areas of interaction with the BSC.

## Industry consultations

We responded to a number of industry consultations over the quarter:

- ENTSO-E consultation on the draft European Network Code on Emergency and Restoration
- Ofgem's consultation on a potential licence modification to enable the future expansion of ELEXON's role
- Electralink DTSA Consultation 2014
- ELEXON's comments on its role under the Electricity Balancing Network Code
- ACER's call for comments on the Network Code on Electricity Balancing

All our responses are published on the [Industry Insights](#) page of the ELEXON website.

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## OPERATION OF THE BALANCING AND SETTLEMENT CODE ARRANGEMENTS

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You can find further details about our operational performance, including performance against our key performance indicators in the ELEXON reports presented to the BSC Panel every month:

- [ELEXON Report 229 – 14 September to 1 October](#)
- [ELEXON Report 230 – 10 October to 5 November](#)
- [ELEXON Report 231 – 14 November to 4 December](#)
- [ELEXON Report 232 – 12 December to 8 January](#)

We report operational issues that affect customers in [ELEXON circulars](#).

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## GOVERNANCE AND CHANGE

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### Modifications

1 new Modification Proposal was raised:

- **P316** 'Introduction of a single marginal cash-out price'

0 Modification Proposals were withdrawn.

4 Modification Proposals were submitted to the Authority for decision:

- **P303** 'Amendments to the Provisions for BSCCo Directors'
- **P304** 'Reduction in PAR from 500MWh to 250MWh'
- **P307** 'Amendments to Credit Default arrangements'
- **P314** 'Reduction in PAR from 500MWh to 350MWh'

6 Modification Proposals were approved or rejected by the Authority:

- **P272** 'Mandatory Half Hourly Settlement for Profile Classes 5-8'
- **P286** 'Revised treatment of RCRC for generation BM Units'
- **P300** 'Introduction of new Measurement Classes to support Half Hourly DCUSA Tariff Changes (DCP179)'
- **P303** 'Amendments to the Provisions for BSCCo Directors'
- **P304** 'Reduction in PAR from 500MWh to 250MWh'
- **P314** 'Reduction in PAR from 500MWh to 350MWh'

1 Modification Proposal was pending Authority decision at 31 December 2014:

- **P307** 'Amendments to Credit Default arrangements'

1 Modification Proposal was approved by the BSC Panel as a Self-Governance:

- **P306** 'Expanding the definition of a 'Letter of Credit' to include regulated insurance companies'

7 Modification Proposals were implemented:

- **P283** 'Reinforcing the Commissioning of Metering Equipment Processes'
- **P291** 'REMIT Inside Information Reporting Platform for GB Electricity'
- **P295** 'Submission and publication of Transparency regulation data via the BMRS'
- **P303** 'Amendments to the Provisions for BSCCo Directors'
- **P306** 'Expanding the definition of a 'Letter of Credit' to include regulated insurance companies'
- **P311** 'Required Housekeeping Changes to Implement P291 and P295'
- **P313** 'Required Housekeeping Changes to Implement P295 and EMR'

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## Change Proposals:

3 Change Proposals were raised:

- **CP1423** 'Amendments to BSCP68 following a review'
- **CP1424** 'Amending the requirement for Data Aggregators to perform annual Full SMRS refreshes'
- **CP1425** 'Consequential changes to BSCP201 following EMR'

4 Change Proposals were implemented:

- **CP1405** 'Facilitating Faster Switching in the NHH Market'
- **CP1408** 'Excessively Large EAC/AA Control Point'
- **CP1412** 'Reporting of deleted BOAs within the SAA-I014 report'
- **CP1413** 'Amendments to BSCP535 'Technical Assurance' following a review'

## BSCP40 issues:

0 BSCP40 issues were raised or remain open during this period.

## Standing Issues:

1 Standing Issue was raised:

- **Issue 59** 'Consideration of the PARMS and Supplier Charge changes introduced by P272 and P300'

2 Standing Issues were closed:

- **Issue 56** 'Treatment of the new SBR and DSBR services in the imbalance price'
- **Issue 57** 'Should Half-Hourly Settlement be mandatory for certain Unmetered Supplies customers?'

## BSC Panel and Committee Activity:

As well as considering the Modifications in the section above, the Panel:

- Agreed with the recommendation of the ISG that the De Minimis Acceptance Threshold (DMAT) pricing parameter remain unchanged at 1MWh and that ELEXON conduct the next review in two years' time
- Considered the Continuous Acceptance Duration Limit (CADL) and agreed that no change is made to CADL at its current value of 15 minutes and that ELEXON conduct the next review in two years' time
- Agreed with the recommendation of the ISG that no change is made to the Market Index Definition Statement (MIDS)
- Made arrangements for hearing referred Trading Dispute DA686
- Served and expulsion notice on a BSC Party following the BSC Party triggering a Section H Default event through non-payment of BSCCo Charges
- Appointed a BSC Panel representative to the Grid Code Review Panel
- Appointed new Panel Committee Members and Alternates for SVG, TDC, PAB
- Set the Terms of Reference for a review of Panel Governance and appointed three Panel Members to form the Panel Governance Review Group

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- Commented on the appointment process and the shortlisting criteria to be used when recruiting a new Chief Executive for ELEXON Ltd
- Developed and Approved a BSC Panel Strategy, incorporating a Strategic Work Programme of activities to feed into the development of the annual BSCCo Business Strategy
- Agreed the timetable for the consideration and approval of the annual BSCCo Business Strategy;
- Approved the draft BSCCo Business Strategy for publication and invitation to comment
- Approved the Electricity Data Quality Report (a joint BSC-MRA report on electricity data quality and its impact on the Change of Supplier process) for release to Ofgem
- Recommended to the Authority that changes to the Code Administrator Code of Practice (CACoP) should be approved and agreed that ELEXON should work with other Code Administrators to develop a new CACoP principle (or amend an existing CACoP principle) regarding the co-ordination of cross-code change;
- Approved changes to the Panel Guidance note concerning the 'Determination of Trading Disputes by the BSC Panel'
- Approved the creation of the confidential Panel Policy for managing referred Trading Disputes
- Approved amended definitions of the Performance Assurance Techniques, 'Education', 'Trading Disputes' and 'BSC Audit'.

## **Imbalance Settlement Group (ISG):**

The ISG continues to oversee and contribute to the development of the CVA arrangements. Decisions included:

- Approved configurable items for P291/P295 for the December 2014 special release
- Approved a change to the BMRS solution for P295 to allow the processing of the A03 Curve Type
- Approved 3 Metering Dispensation
- Approved 2 non-standard BM Unit statuses
- Approved CP1422 for implementation in the February 2015 BSC Systems Release
- Approved one Credit Assessment Load Factor appealed for the Winter BSC Season.

## **Supplier Volume Allocation Group (SVG):**

The SVG continues to oversee and contribute to the development of the SVA arrangements. The SVG:

- Oversaw the progression of 44 changes to Market Domain Data (MDD).
- Agreed that ELEXON should raise an MDD Change Request to clear six redundant MDD role codes and reassign two for use in the Electricity Market Reform arrangements.
- Approved three Change Proposals (CPs) for implementation in the February 2015 Release:
  - CP1419 'Improving data accuracy by enabling the D0312 flow to be sent on a Change of Supplier'
  - CP1421 'Linking BSCP520 obligations to the Operational Information Document'
  - CP1422 'Add a Defined Metering Point for an Offshore Transmission Connection Point to the Half Hourly Codes of Practice'.

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- Approved the Reporting Catalogue changes for the December 2014 Special Release.
- Approved a Metering Dispensation on an unconditional lifetime basis, relating to low voltage supplies at an Offshore wind farm.
- Approved 45 Unmetered Supplies Charge Codes for new installations of Openreach's existing types of fibre optic broadband cabinets, to be effective in Settlement from 21 January 2015.
- Approved the Unmetered Supplies User Group's recommended changes to the Operational Information Document, effective from 17 December 2014.

## **Trading Disputes Committee (TDC):**

The TDC:

- Upheld seven Trading Disputes with two deferrals from November to December. The seven Disputes upheld had a total estimated materiality of £2.2million. One of the Trading Disputes was CVA and six SVA.

## **Performance Assurance Board (PAB):**

In addition to normal work, the PAB:

- Approved the Qualification of:
  - Emexconsult Ltd as a HH and NHH Supplier
  - Effortless Energy Ltd as Non-Half-Hourly Supplier
  - Sierra Support Services Group Limited as a Non-Half-Hourly Meter Operator Agent.
- Approved:
  - Within Period Revision to the 2014/15 Risk Evaluation Register
  - Risk Operating Plan 2015/16
  - The Annual Performance Assurance Timetable for 2016/17
  - A letter is sent out notifying customers of PAB's intention to move towards a controls based BSC Audit process for 2015/16.
- Approved:
  - Error and Failure Resolution (EFR) monitoring switched off for two Supplier IDs for Settlement Risk SR0074
  - EFR switched on for a Supplier ID for Settlement Risk SR0074
  - Initiating the PAB escalation process for two Supplier IDs for Settlement Risk SR0074
  - EFR switched on for Settlement Risks SR0046, SR0047 and SR0095 for two Supplier IDs.
- Approved:
  - The results of the BSC Audit compliance check
- Commented on:
  - ELEXON's planned approach for managing the PAB and the Performance Assurance Framework (PAF) impacts from P272 and P300 including:

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- The illustrative P272 Supplier and Supplier Agent plans being requested and the updated Change of Measurement Class Guidance Note.
- Noted:
  - Electricity Market Reform (EMR) update
  - BSC Audit Approach Document presented by the BSC Auditor
  - ELEXON report on analysis of Trading Disputes raised, over the past three years
  - ELEXONs results of the analysis into the root causes of the Trading Disputes of a DNO
  - IS strategy update
  - Ongoing work on the P283 Guidance Document
  - Planned TAPAP checks for January to March 2015
  - Update on the outcome of Issue 59.

## REVIEW AGAINST THE ANNUAL BUDGET

### Summary

The year to date expenditure for the first three quarters of 2014/15 is £23.8m which is £4.0m (14.4%) below budget.

The full year forecast stands at £31.8m for regular BSC activity.

The forecast underspend for the year is £6.1m.

### Expenditure by Type

The position against budget for the full year is summarised below:

£m	YTD	Var.	Full Year	Var.
Operational	12.1	1.0	15.6	1.1
Demand Led	0.9	0.9	1.1	1.3
Contracted	9.2	0.7	11.2	0.7
System Strategy	1.6	0.4	2.1	1.2
Market Development	-	1.0	0.2	1.8
<b>TOTAL</b>	<b>23.8</b>	<b>4.0</b>	<b>30.2</b>	<b>6.1</b>

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## **Operational expenditure**

The operational expenditure for the first three quarters of the financial year stands at £12.1m which represents a forecast underspend of £1.0m.

The full year operational expenditure is forecast to be £15.6m. Once taking account of costs defrayed through the EMR grant, the forecast underspend for the year is £1.1m.

The EMR grant fully covers the cost of additional resources required (both those working directly on the project as well as those required as back-fill). It also recovers the cost of existing ELEXON employees based on time spent.

## **Demand led expenditure**

Demand led expenditure is £0.9m for the first nine months of the financial year. We have incurred £0.8m on BSC system release projects and a total cost of £0.1m on panel committee projects, impact assessments and modification proposals.

Full year forecast is under budget by £1.3m, which is due to a reduced number of modification proposals (£0.7m), reduced number of release projects and impact assessments (£0.1m) and the release of the £0.5m strategic development budget.

## **Contracted expenditure**

We have incurred £9.2m on contracted services in the first three quarters of the financial year, £4.7m of which relates to BPO services.

The full year forecast is underspent by £0.7m. £0.5m savings due to AMD/BPO procurement project placed on hold and £0.2m savings from Party qualification and annual profiling service review.

## **System strategy**

So far, costs totalling £1.6m have been incurred relating to various system strategy projects. This includes cost for the BMRS project (£0.7m) and other smaller projects.

The full year variance of £1.2m is attributed to £0.3m budget released to fund additional resources required to support system strategy work and £0.9m released due to clearer view of future activities.

## **Market development**

The market development expenditure is £1.0m under budget for the first nine months of the financial year. This is due to budget released to fund the graduate scheme in a bid to increase operational resources.

Full year variance of £1.8m is as a result of budget released resulting from clearer view of future activities now known.