REQUIREMENTS SPECIFICATION TO SUPPORT MODIFICATION PROPOSAL P99:

Changes to Accreditation and the PARMS Serials and Standards resulting from the Performance Assurance Framework (PAF) Review (Phase 1)

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Reference 1	P99 Modification Proposal (2 September 2002)
Reference 2	P99 Initial Written Assessment (P99IWA10) (12 September 2002))
Reference 3	Panel Paper 43/019 PAF Review Final Report (18 April 2002)

d Intellectual Property Rights and Copyright

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1 INTRODUCTION

1.1 BACKGROUND AND SCOPE

This Requirements Specification for Modification Proposal P99 'Changes to Accreditation and the PARMS Serials and Standards resulting from the Performance Assurance Framework (PAF) Review (Phase 1)' outlines the proposed solution to be used in a consultation and parallel Detailed Level Impact Assessment (DLIA).

P99 (Reference 1) was raised by British Gas Trading on 2 September 2002 on behalf of the PAF Review, a Panel-sponsored initiative that seeks to review and improve the level of assurance provided across the BSC trading arrangements. Phase 1 of the PAF Review focused on the assurance techniques of Accreditation, Audit, Entry Processes and PARMS Serials and Standards, with each technique being analysed by a separate Expert Group consisting of industry representatives.

The recommendations of each of the Expert Groups were endorsed by the Panel on 18 April 2002 (Panel Paper 43/019, Reference 3); therefore the purpose of P99 is to progress the necessary changes to the Code, Code Subsidiary Documents, BSC and BSCCo systems and participant systems in order to implement the findings of the PAF Review.

An Initial Written Assessment for P99 (Reference 2) was presented to the Panel on 12 September 2002, where it was agreed that P99 be submitted to a 2-month Assessment Procedure.

1.2 PURPOSE AND STRUCTURE OF DOCUMENT

This document represents a consolidation of three of the Expert Groups that contributed to the PAF Review Project. It specifies in detail the proposals of each of the Groups such that BSC Parties and Party Agents may undertake a parallel consultation and DLIA on the changes required for P99. In addition to the detail in Section 2, Annex A of this Requirements Specification contains the proposed design of the new Certification Checklist to be used in the improved Accreditation process. Annex B contains the complete set of PARMS serials proposed by P99, detailing the aims of each serial, the source of the information, and a summary of the information required to be submitted into PARMS. A cross-reference between the current serials and those proposed by P99 is contained in Annex C.

The overall aim of the Assessment Procedure is to confirm that the proposed changes better facilitate the Applicable BSC Objectives and to obtain estimates for costs and lead times associated with P99 such that a provisional Implementation Date can be determined and presented in an Assessment Report.

1.3 GLOSSARY

The following acronyms have been used throughout this document:

BSC	Balancing and Settlement Code
BSCCo	Balancing and Settlement Code Company

BSCP	BSC Procedure
CDCA	Central Data Collection Agent
CVA	Central Volume Allocation
DA	Data Aggregator
DC	Data Collector
EPA	Entry Process Agent
HH	Half Hourly
MOA	Meter Operator Agent
NHH	Non Half Hourly
PAB	Performance Assurance Board
PAF	Performance Assurance Framework
SMRA	Supplier Meter Registration Agent
SMRS	Supplier Meter Registration Service
SVA	Supplier Volume Allocation
SVAA	Supplier Volume Allocation Agent
TA	Technical Assurance

2 REQUIREMENTS SPECIFICATION

P99 seeks to modify the Code and its associated documents and systems in order to implement Phase 1 of the PAF Review. Of the assurance techniques included in this Phase, only the improvements to Accreditation and the PARMS Serials and Standards require a Code Modification. The progression of improvements to the BSC Audit is the responsibility of the Panel alone, and the scope of changes to Entry Processes is limited to Code Subsidiary Documents and other configurable items. However, the Panel agreed with the recommendation of the PAF Review Project that all the non-Audit improvements in Phase 1 should be implemented in parallel; therefore the Entry Process improvements are included within the scope of P99.

It is the belief of the PAF Review that the proposed changes would serve to reduce administration costs incurred by participants (particularly Suppliers) when completing the many assurance processes (such as re-certification and interface testing) required by the BSC, and in doing so would promote competition in supply. The changes to the PARMS Serials and Standards, while requiring some additional work in the area of data submission, would improve market monitoring and create greater incentives on participants to meet with their obligations, thus improving the efficiency of the overall trading arrangements. The PAF Review believe these benefits would help to better facilitate Applicable BSC Objectives (c) and (d) respectively, and so form a suitable rationale for a Code Modification.

2.1 Accreditation

Accreditation provides the industry with confidence that new Party Agents can deliver to minimum standards defined in the Code and Code Subsidiary Documents. In its analysis of the current Accreditation techniques, the PAF Review concluded that several steps in the process could be made easier by introducing the following new procedures. It is envisaged that these steps will be incorporated into BSC Procedure BSCP531 (Accreditation).

2.1.1 New Certification Checklist

The Self-Assessment Certification Return (SACR) form currently used in the Accreditation process would be redesigned to be less repetitive and to focus more on the business events that most lead to risk.

The new checklist would contain short generic sections to be completed by all types of Agents, in which the questions would be fairly general. These would then be followed by more detailed sections focusing on specific Agent types, in which the questions would be very specific. This approach would help to ensure that the appropriate amount of information is entered into the form, reducing the workload on the Applicant and the PAB reviewer. A draft design plan for the revised checklist is contained in Annex A.

2.1.2 Risk Assessment

P99 would establish a new risk assessment procedure for use in Certification that aims to differentiate between impact and probability of an Agent failure and between risks that are regarded as inherent or variable. The results of the risk assessment, undertaken by BSCCo based on evidence received and the parameters described below, would determine the way in which an Applicant would be required to use the new Certification Checklist. The key features of the revised process would be as follows:

a) Inherent Risk

Of the risks associated with any Agent, some are common to a particular Agent role and can be well defined; these are 'inherent' risks. The role of the Agent in question gives an indication of the impact on Settlement should a failure occur, and BSCCo operational experience provides an estimate of the probability of such a failure. Using a simple scoring system, BSCCo's view of the inherent impact and probability of Agent failure can be summarised:

Participant Type	**Inherent Impact**					**Inherent Probability**	
	Direct Impact on Settlement from a failure	Robustness of wider systems to a failure	# of other parties impacted	Complexity of recovery of agency systems	Score (out of 10)	Current # & complexity of problems	Score
SMRS	High	Medium	Low	Medium	8	Low	1
NHH							
SVA NHH MOA	Low	Medium	Medium	Low	6	Medium	2
SVA NHH DC	Medium	High	Medium	High	10	High	3
SVA NHH DA	High	Low	Low	Low	6	Low	1
HH							
SVA HH MOA	Medium	High	Medium	Low	8	Medium	2
SVA HH DC	Medium	High	Medium	High	10	High	3
SVA HH DA	High	Low	Low	Low	6	Low	1
Meter Administrator	Low	Low	Low	Low	4	Low	1

CVA MOA	Medium	High	Low	Low	7	Medium (cf SVA HHMOA)	2

Scoring – Low = 1; Medium = 2; High = 3.

b) Variable Risk

There are other risks that are not inherent to Agent role and instead depend on the volume of energy and the number of metering systems associated with a particular Agent. On the basis that the higher the annual processed energy volume, the higher the impact of a failure, a score for variable impact would be determined according to the following:

SVA Annual Energy Volume	**Impact**	**Score**
0 – 50 TWh pa	Low	1
51 – 100 TWh pa	Medium	2
101+ TWH pa	High	3
CVA Total Installed Capacity	**Impact**	**Score**
< 10 MVA	Low	1
11 MVA – 100 MVA	Medium	2
101 MVA +	High	3

(These figures represent a starting point that would change should more accurate information be available from industry)

The probability would then be determined based on the number of associated metering systems, with the assumption that the higher the number, the higher the probability of a problem occurring. Using the same scoring system as before, the following probability figures would be assigned:

Number of Metering Systems (MSIDs)	**Probability**	**Score**
NHH		
1 – 1m	Low	1
1m – 3.5m	Medium	2
3.5m+	High	3
SVA HH		
1 -10K	Low	1
10K – 50K	Medium	2
50K+	High	3
CVA HH		
1 - 25	Low	1
26 – 200	Medium	2
200+	High	3

c) Relative Risk

The Relative Risk would be determined such that

$$\textit{Relative Risk} = \textit{Impact} \times \textit{Probability}$$

This would take into account both inherent and variable values, with the separate impact and probability components added together.

The table below demonstrates how a Relative Risk rating would be determined for each Agent role:

Participant Type	Impact			Probability			Relative RISK Score	Relative RISK Rating
	Inherent Impact score (A)	Variable Impact Score 1-3 (B)	**Impact Total (A) + (B) = (C)**	Inherent Probability score (D)	Variable Probability Score 1-3 (E)	**Prob Total (D)+(E) = (F)**	**Score = (C)x(F)**	**Score of 10 - 27 = L 28 – 35 = M 36 – 90 = H**
SMRS (PRS)	8	1-3	**9-11**	1	1-3	**2-4**	**18-44**	**L / M / H**
NHH								
SVA NHH MOA	6	1-3	**7-9**	2	1-3	**3-5**	**21-45**	**L / M / H**
SVA NHH DC	10	1-3	**11-13**	3	1-3	**4-6**	**44-78**	**H only**
SVA NHH DA	6	1-3	**7-9**	1	1-3	**2-4**	**14-36**	**L / M / H**
HH								
SVA HH MOA	8	1-3	**9-11**	2	1-3	**3-5**	**27-55**	**L / M / H**
SVA HH DC	10	1-3	**11-15**	3	1-3	**4-6**	**44-90**	**H only**
SVA HH DA	6	1-3	**7-9**	1	1-3	**2-4**	**14-36**	**L / M / H**
Meter Administrator	4	1-3	**5-7**	1	1-3	**2-4**	**10-28**	**L / M only**
CVA MOA	7	1-3	**8-10**	2	1-3	**3-5**	**24-50**	**L / M / H**

The variable risk results in a range of Relative Risk ratings for each group, the exception being Data Collectors, which will always be regarded as High risk categories.

d) Certification

Depending on the outcome of the risk assessment, the applicant would proceed with certification in one of three ways:

- A low-risk applicant would complete the Certification Checklist as a self-assessment and send it to the BSCCo Technical Assurance (TA) team to be validated. If all the information is complete and correct, the Applicant may inform PAB and request accreditation/certification;
- A medium-risk applicant would complete the Checklist and then review the information with a visiting member of the TA team. If no issues are identified the Applicant may inform PAB and request accreditation/certification;
- A high-risk participant would go through the Checklist and then review the information with the Certification Agent and if appropriate a member of the TA team. If the Certification Agent is satisfied, a report would be prepared for PAB stating that the Applicant can meet its obligations and should be accredited/certified.

In all cases, a Technical Assurance visit would be carried out six months after a successful application.

2.1.3 Re-Certification

At present, re-certification is required when, according to BSCP531, 'a change is planned that is indicated as posing a significant risk to Settlement by the Party Agent's certified Risk Assessment Procedure'. This is unsatisfactory, as it is not clear what constitutes a 'change' and a 'risk to Settlement'.

P99 proposes that re-certification is initiated only when there is a significant change to the functionality of a system process that could present a risk to Settlement. Examples include:

- Changes to more than half of a participant's certified working instructions, with a 'Big Bang' implementation approach;

- A significant increase in business volume (>30% per annum);
- A significant change or upgrade to the IT system; and
- Introduction of a new software application to be used by the participant as a central tool for the storing, manipulation and transfer of data.

Re-certification may also be triggered by a direct request from PAB.

In addition to identifying the risks involved in a change, re-certification would also aim to ensure that the participant has put appropriate mitigating strategies place so as to offer a level of protection against the risks identified. Therefore the re-certification process would be revised as follows:

- The participant would carry out a risk assessment using its own certified risk assessment procedure to determine whether the proposes change constitutes a High, Medium or Low risk;
- The assessment would be sent to the BSCCo Technical Assurance (TA) team for validation. If required, further information or clarification may be requested, or a TA visit scheduled;
- For a Low or Medium risk participant, if there are no concerns raised by the TA validation, the participant would inform PAB that the change is planned and no further work is required;
- For a High-risk participant, the TA team would visit to review the mitigating strategies and run through the relevant sections of the certification checklist. If there are no issues the participant would then inform PAB that the change is planned and re-certification has been completed.

It is intended that Low or Medium risk participants should be able to complete re-certification entirely by correspondence in most cases.

2.1.4 Additional Certification

Where an Agent intends to change its role to another that is significantly different (e.g. from SVA NHH MOA to SVA NHHDC) full Certification is required. However, P99 proposes that a change in role to one that is similar or less onerous (e.g. from SVA NHH MOA to CVA HH MOA) should require only Additional Certification, using the revised re-certification process as described above.

The table below indicates various Agent Role changes that would require Certification (C) and Additional Certification (AC):

	Proposed New Role							
Current Certified Role	SMRA	SVA NHH MOA	SVA NHH DC	SVA NHH DA	SVA HH MOA	SVA HH DC	SVA HH DA	CVA MOA
SMRA	n/a	C	C	C	C	C	C	C
SVA NHH MOA	C	n/a	C	C	AC	C	C	AC

SVA NHH DC	C	C	n/a	C	C	AC	C	C
SVA NHH DA	C	C	C	n/a	C	C	AC	C
SVA HH MOA	C	AC	C	C	n/a	C	C	AC
SVA HH DC	C	C	AC	C	C	n/a	C	C
SVA HH DA	C	C	C	AC	C	C	n/a	C
CVA MOA	C	AC	C	C	AC	C	C	n/a

2.2 Entry Processes

The current Entry Processes would be revised in light of operational issues in the SVA Trading Arrangements to make the processes more relevant, and to reduce the workload on applicants whilst maintaining the existing level of assurance. This would ensure that new market entrants are required to demonstrate their systems and processes to the same level as previous entrants, but would also provide added assurance to ELEXON and existing Parties that the SVA Trading Arrangements would not be adversely affected by a new entrant.

2.2.1 Test Scripts and Scenarios

For *new* entrants, under P99 the number of functional scripts would remain the same, but the scripts will be re-focused and the effectiveness of the tests improved, replacing some of the current scripts with more meaningful business scenarios. Additionally some scripts will be changed to better test current operational issues particularly in the areas of the provision of meter technical details, transfer of history and exception reporting processes etc. Specific changes would include:

- widening the variety of data used in the arithmetic accuracy tests (scenarios 1 and 2);
- alterations to the Functional Tests (scenarios 3 and 4) to include business areas not originally included because they were still in development (e.g. un-metered supplies and the Pre-Payment Meter Infrastructure Provider (PPMIP) role for the NHH market);
- tests to cover missing and invalid D0010/D0152 and D0149/D0150 data, which would demonstrate the applicant's ability to trace missing data, identify errors, and determine whether data needs to be resent or reprocessed;
- a test to prove that the applicant can handle errors satisfactorily.

2.2.2 Use of the Entry Process Agent in Testing

The Entry Process Agent would be allowed to simulate the role of other participants when testing an applicant's ability to operate with other Parties or Party Agents. The dataflows issued by the applicant according to the test scripts would be received and examined by the EPA on site, who would use the information contained in them to produce realistic response flows to the applicant. In addition, the EPA would deliberately include erroneous data in some of the flows to test the applicant's ability to detect and resolve such errors.

2.2.3 Individual Qualification of New Agents for use by Suppliers

For both new *and* existing Suppliers and Supplier Agents, the process for qualifying additional hubs would be rationalised to minimise the administration and approval process without reducing the assurance. At present, a Supplier has to apply for, and gain approval to use each full combination of Supplier Hub, i.e. Supplier/Data Aggregator/Data Collector/Meter Operator/GSP Group.

This would be changed so that a Supplier would instead have to apply to use each Agent it wished to operate with in each GSP Group (and complete all the necessary interface tests), but it would not have to request approval for each full hub combination it wishes to use. This would remove the administration but would not lessen the assurance.

Once a Supplier has been approved by PAB to operate with a particular Agent, that Agent would automatically be qualified to operate with any other Agent already approved to work with the same Supplier as long as the Agent-to-Agent tests have been completed. A Supplier would still have to apply for each Agent they wished to use in each GSP group, but would not have to declare and obtain individual approval for all required combinations of Agents. The Entry Process Agent would maintain a log of the Supplier/Agent and Agent/Agent tests that have been completed to ensure that testing between each pair is only required once.

2.2.4 Checks for Business Continuity Plans

The Supplier Readiness Checklist would be amended to include confirmation that suitable Business Continuity Plans are in place.

2.3 PARMS Serials and Standards

The PARMS Serials and Standards would be revised to reflect the current needs of market monitoring, to help encourage increases in performance for some serials, and reduce the overall complexity of the collation and reporting of Serials data. The full details of PARMS data submission and reporting are covered in BSCP533 and BSCP534. Should P99 be implemented, these documents will be revised to contain all the details necessary to ensure the proposed changes are able to take effect.

2.3.1 New Set of Serials and Standards

The present set of PARMS Serials and Standards would be revised by removing those Serials that are unnecessary or impractical, amending those that require (for example) more stringent Standards, or adding completely new Serials with which to monitor specific market issues. Annex B of this Requirements Specification lists the complete set PARMS Serials that would be introduced by P99. The list identifies any new serials, the performance standards proposed for each Serial, and the kind of information that would be required to be submitted by the Supplier or Agent identified as the source of the Serial data. In addition, Annex C cross-references the proposed Serials to those currently in effect.

2.3.2 Data Acquisition and Verification

All PARMS data provided to BSCCo (other than that sourced from the SVAA) is currently provided by Suppliers. For those Agent-related Serials, this involves the onerous task of

Suppliers collating data form all their Agents and passing it on to BSCCo within the required timescales. This approach would be simplified by a requiring that data pertaining to Agent-related Serials should submitted by the Agents themselves. Suppliers would have the opportunity to verify the data when it is distributed by BSCCo.

Note that, though relieved of the data acquisition task, Suppliers would still be responsible for ensuring the information is provided within the relevant timescales by its Agents and therefore would still be liable to Supplier Charges if these conditions are not met.

An existing defect in PARMS would also be corrected: at present, where there have been no instances of a particular Serial being measured, participants have to provide a 0% or 100% return, which causes distortion in the performance figures. This issue would be remedied by introducing an 'N/A' option into PARMS for use in such circumstances.

2.3.3 National Level Reporting

Agent performance would be reported on a national level rather than per GSP Group. The reporting of performance in relation to the Trading Arrangements, Suppliers and Supplier Hubs will remain at the GSP Group level.

2.3.4 Peer Comparison

The Peer Comparisons report issued by BSCCo to Suppliers and Supplier Agents (as appropriate) contain a large volume of Serial statistics that makes extracting useful information difficult. The Reports would be condensed and filtered so as to give a clearer indication of specific performance levels (such as data quality or speed of response) as well as overall performance.

3 IMPACT ON BSCCO

In addition to the necessary documentation updates required for P99 (for which see Section 7), changes would be required to some of BSCCo's systems and processes in order to fully implement the proposals of the PAF Review Project.

The Entry Processes and Accreditation Procedures operated by BSCCo will require significant alteration, and in the case of Accreditation, the increased role of Technical Assurance is expected to require an increase in staff (an estimated two extra people).

BSCCo's PARMS system will require significant changes to reflect the new set of Serials and Standards, particularly with regard to file validation and the automatic uploading of necessary data. The flows to be used by Suppliers and Supplier Agents to submit the required PARMS data will have to be designed and tested. In addition, the processing and display techniques currently operated by PARMS will have to be modified to account for the new or modified Serials and Standards. Peer Comparison reports will be improved as described in section 2.3.4 above, and the reporting for Supplier Charges, Removal of Accreditation and Error/Failure Resolution processes will also require amendment. .

4 IMPACT ON PARTIES AND PARTY AGENTS

The main impact of P99 on existing BSC Party and Party Agents would relate to the PARMS improvements. New reports will have to be designed for submission of PARMS data (these

should be based upon the format suggested by BSCCo); once established these will then have to be used on an ongoing basis. The collation and production of the new reports would also require an amount of additional staff training.

5 IMPACT ON BSC SYSTEMS

The SVAA PARMS processes will require revision similar to those made by Parties and Party Agents, the main focus being the designing of new reports for submission of data to BSCCo.

In addition, two of the new serials on CVA MOAs source their data from the Central Data collection Agent (CDCA). The information required is not provided in any of the present CDCA reports, therefore new reports will need to be designed to enable the information to be submitted manually to BSCCo (an electronic data file would not be required) for use in PARMS.

6 IMPLEMENTATION ISSUES

During the PAF Review some Suppliers and Supplier Agents indicated an interest in using the Data Transfer Network (DTN) to submit PARMS reports to BSCCo rather than using email as in the current arrangements. While the data requirements do not differ between email and DTN submission, the impact of a DTN approach on participants and BSCCo would be significant and requires assessment. Therefore, the option of using the DTN to submit all PARMS data (for all participants) will be consulted upon.

The complexity of PARMS and its importance to the market requires a specific approach in relation to the implementation strategy for the proposed improvements. Once the PARMS requirements have been agreed and approved they would be published to allow participants to begin to develop the necessary software changes well in advance of the Implementation Date. During the lead up to implementation, BSCCo will organise workshops attended by participants to ensure the agreed PARMS requirements are met by the software changes. Implementation would be followed by a 'grace period' of a few months during which post implementation workshops would be held and Supplier Charges for late (but not missing) data submissions waived. Furthermore, some of the new Serials and Standards would be reviewed following implementation to ensure that their performance levels and corrective techniques are appropriate. The exact timetable for such an implementation strategy will depend upon the estimated lead times provided by participants.

A potential relationship between P99 and P62 (Changes to Facilitate Competitive Supply on the Network of New Licensed Distributors) has been identified by BSCCo with regard to Entry Processes. P62, which has been approved by the Authority for implementation on 1 August 2003, involves development of the Entry Processes to allow new Licensed Distribution System Operators (LDSOs) to enter the market. One of the improvements being investigated is the ability of the Entry Process Agent to simulate other participants during testing – the same improvement proposed by the PAF Review and included in P99. This overlap may be a factor when planning the implementation strategy for P99 and so should be noted.

7 CHANGES REQUIRED TO THE CODE, CODE SUBSIDIARY DOCUMENTS & OTHER CONFIGURABLE ITEMS

This section defines the amendments that would be required to the Code, Code Subsidiary Documents, Core Industry Documents and other configurable items.

7.1 Code

Changes would be required to Sections J and S of the BSC to reflect the alterations in Accreditation and PARMS Serials and Standards respectively. The full details of the proposed changes are contained in Initial Written Assessment for P99 (Reference 2) but below is a summary:

Section J 'Party Agents'

This Section would be modified to reflect the change in the Accreditation process so that the Certification Agent is only involved in certain circumstances (i.e. where an applicant has been identified as high risk). It would also be modified to require SMRAs to provide registration data to BSCCo for the purposes of market monitoring (this is because the revised set of Serials requires information from SMRAs)

Section S 'Supplier Volume Allocation'

Annex S-1 'Performance Levels and Supplier Charges' would be revised extensively to reflect the new Standards and Serials, in particular the various Supplier Serials.

7.2 Code Subsidiary Documents

The following Code Subsidiary Documents, including BSC Procedures (BSCPs), Party Service Lines (PSLs), SVAA Service Lines (SSLs) and the BSC SVA Data Catalogue would be impacted and any changes required would be developed by ELEXON after Authority approval of P99.

The documents below would require revision to reflect the specific changes described in Section 2.

- BSCP512 – Entry Process – Supplier
- BSCP531 – Accreditation
- BSCP533 – PARMS Data Provision
- BSCP534 – PARMS Techniques

The CDCA Service Description may require amendment if provision of information in relation to the CVA MOA Serials constitutes a completely new requirement.

The following documents all contain references to the set of PARMS Serials and Standards modified by P99 and so would require revision:

- BSCP536 – Supplier Liquidated Damages
- BSC SVA Data Catalogue (Part 1)
- PSL110 – SVA Meter Operation
- PSL120 – Non Half Hourly Data Collection
- PSL140 – Non Half Hourly Data Aggregation
- PSL150 – Half Hourly Data Aggregation
- PSL160 – Supplier Meter Registration Service
- PSL180 – CVA Meter Operation

- SSL300 – Supplier Volume Allocation
- SSL310 – Daily Profile Production
- SSL360 – Market Domain Data

7.3 Other Configurable Items

The ELEXON Local Working Instructions and Industry Guides for Accreditation and Entry Process would be updated. The CDCA User Requirements Specification (URS) and Interface Definition and Design (IDD) may need to be altered for the CDCA to provide the required PARMS data to BSCCo.

ANNEX A – PROPOSED NEW CERTIFICAITON CHECKLIST DESIGN

See attached document.

ANNEX B – PROPOSED PARMS SERIALS AND STANDARDS

See attached document.

ANNEX C – CROSS-REFERENCE BETWEEN CURRENT AND PROPOSED PARMS SERIALS

See attached document.