

146/04



INITIAL WRITTEN ASSESSMENT for Modification Proposal P227

'Extension Of The Definition Of ECVAA Systems to include the centrally provided communications network.'

Prepared by: ELEXON Limited¹

| | | | |
|--------------------------|--------------------|----------------------------|--------|
| Date of Issue: | 3 October 2008 | Document Reference: | P227IR |
| Reason for Issue: | For Panel Decision | Version Number: | 1.0 |

This document has been distributed in accordance with Section F2.1.10 of the Balancing and Settlement Code.²

P227 seeks to ensure that Parties have the ability to resubmit contracts as a result of a failure of the centrally provided communications network. The solution proposes to extend the definition of the Energy Contract Volume Aggregation Agent (ECVAA) system to include the centrally provided communications network, and any failure of any part of the centrally provided components that affects parties' ability to submit contract notifications should be considered as an ECVAA system failure. Parties would then be able to utilise the same provisions that currently exist in the Code for contract resubmission resulting from an ECVAA System Failure.

P227 has been developed on the basis of the Alternative solution for Modification P1.

BSCCO'S RECOMMENDATIONS

On the basis of the initial assessment, BSCCo invites the Panel to:

- **DETERMINE that Modification Proposal P227 should be submitted to the Assessment Procedure;**
- **AGREE the Assessment Procedure timetable such that an Assessment Report should be completed and submitted to the Panel for consideration at its meeting of 11 December 2008;**
- **DETERMINE that the P227 Modification Group be formed from members of the Settlement Standing Modification Group (SSMG); and**
- **AGREE the Modification Group Terms of Reference.**

¹ ELEXON Ltd fulfils the role of the Balancing and Settlement Code Company ('BSCCo'), pursuant to Annex X-1 of the Balancing and Settlement Code (the 'Code').

² The current version of the Code can be found at <http://www.elexon.co.uk/bscrelateddocs/BSC/default.aspx>.

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SUMMARY OF IMPACTED PARTIES AND DOCUMENTS

As far as BSCCo has been able to assess, the following parties/documents are potentially impacted by Modification Proposal P227.

Please note that this table represents a summary of the full initial impact assessment results contained in Appendix 2.

| Parties | Sections of the BSC | Code Subsidiary Documents |
|--|---------------------------------------|--|
| Distribution System Operators <input type="checkbox"/> | A <input type="checkbox"/> | BSC Procedures <input type="checkbox"/> |
| Generators <input checked="" type="checkbox"/> | B <input type="checkbox"/> | Codes of Practice <input type="checkbox"/> |
| Interconnectors <input checked="" type="checkbox"/> | C <input type="checkbox"/> | BSC Service Descriptions <input checked="" type="checkbox"/> |
| Licence Exemptable Generators <input type="checkbox"/> | D <input type="checkbox"/> | Party Service Lines <input type="checkbox"/> |
| Non-Physical Traders <input checked="" type="checkbox"/> | E <input type="checkbox"/> | Data Catalogues <input type="checkbox"/> |
| Suppliers <input checked="" type="checkbox"/> | F <input type="checkbox"/> | Communication Requirements Documents <input checked="" type="checkbox"/> |
| Transmission Company <input type="checkbox"/> | G <input type="checkbox"/> | Reporting Catalogue <input type="checkbox"/> |
| Party Agents | H <input type="checkbox"/> | Core Industry Documents |
| Data Aggregators <input type="checkbox"/> | I <input type="checkbox"/> | Ancillary Services Agreement <input type="checkbox"/> |
| Data Collectors <input type="checkbox"/> | J <input type="checkbox"/> | British Grid Systems Agreement <input type="checkbox"/> |
| Meter Administrators <input type="checkbox"/> | K <input type="checkbox"/> | Data Transfer Services Agreement <input type="checkbox"/> |
| Meter Operator Agents <input type="checkbox"/> | L <input type="checkbox"/> | Distribution Code <input type="checkbox"/> |
| ECVNA <input checked="" type="checkbox"/> | M <input type="checkbox"/> | Distribution Connection and Use of System Agreement <input type="checkbox"/> |
| MVRNA <input checked="" type="checkbox"/> | N <input type="checkbox"/> | Grid Code <input type="checkbox"/> |
| BSC Agents | O <input type="checkbox"/> | Master Registration Agreement <input type="checkbox"/> |
| SAA <input type="checkbox"/> | P <input checked="" type="checkbox"/> | Supplemental Agreements <input type="checkbox"/> |
| FAA <input type="checkbox"/> | Q <input type="checkbox"/> | Use of Interconnector Agreement <input type="checkbox"/> |
| BMRA <input type="checkbox"/> | R <input type="checkbox"/> | BSCCo |
| ECVAA <input checked="" type="checkbox"/> | S <input type="checkbox"/> | Internal Working Procedures <input checked="" type="checkbox"/> |
| CDCA <input type="checkbox"/> | T <input type="checkbox"/> | BSC Panel/Panel Committees |
| TAA <input type="checkbox"/> | U <input type="checkbox"/> | Working Practices <input type="checkbox"/> |
| CRA <input type="checkbox"/> | V <input type="checkbox"/> | Other |
| SVAA <input type="checkbox"/> | W <input type="checkbox"/> | Market Index Data Provider <input type="checkbox"/> |
| Teleswitch Agent <input type="checkbox"/> | X <input checked="" type="checkbox"/> | Market Index Definition Statement <input type="checkbox"/> |
| BSC Auditor <input type="checkbox"/> | | System Operator-Transmission Owner Code <input type="checkbox"/> |
| Profile Administrator <input type="checkbox"/> | | Transmission Licence <input type="checkbox"/> |
| Certification Agent <input type="checkbox"/> | | |
| Other Agents | | |
| Supplier Meter Registration Agent <input type="checkbox"/> | | |
| Unmetered Supplies Operator <input type="checkbox"/> | | |
| Data Transfer Service Provider <input type="checkbox"/> | | |

1 DESCRIPTION OF PROPOSED MODIFICATION

1.1 Background

P227 seeks to allow for Parties to resubmit notifications as a result of a failure of the centrally provided communications network. P227 would do this by extending the definition of 'ECVAA System' to include the centrally provided communication network.

Under the current arrangements, if the ECVAA experiences a System Failure, a recovery procedure exists that allows participants to submit/re-submit contract notifications to the ECVAA, post Gate Closure, for the affected Settlement Periods.

Communications with ECVAA Systems

Participants have a choice of two network communications options to support data communication in both directions between participant systems and BSC Central Systems, these are known as the High Grade Service and Low Grade Service.

The High Grade Service transmits communications from the router at the participant's site via dedicated telecommunications facilities to the router at the BSC Central Systems Site (see Figure 1). Upon application by a participant for the provision of the High Grade Service to ELEXON the BSC Agent provides the participant with a router at its site which connects to the participant's network infrastructure and communications lines. The participant is responsible for its connection to its router.

The Low Grade Service transmits communications from the router on the participant's site via the public Internet to the Internet Portal for the BSC Central Systems Internet Service Provider. Communications received by the Internet Service Provider are then transmitted to the router on the BSC Central Systems site. Participants are responsible for providing their own links into the Internet.

The current ECVAA System Boundary for the High Grade and Low Grade Services extends only as far as the router on the BSC Central Systems site. In the event of a communications failure beyond the current ECVAA System Boundary that prevents contract notifications being made, participants do not have recovery provisions.

The inability to successfully send and receive confirmation of notifications could result in Parties being in energy imbalance and hence could have a significant effect on imbalance charges, despite the fact that they may have been balanced if the communications failure had not occurred.

The Proposer notes that such inconsistent treatment means that a Party has a mechanism to prevent any charges that arise in the event of a central system failure, yet would be exposed to imbalance charges in the event of a communications failure.

Modification Proposal P1

Modification P227 is modelled on the Alternative Modification Proposal P1 'Extension of the Definition of ECVAA Systems Failure for Permitting Post Gate Closure Notification'. P1 Proposed Modification sought to extend the definition of 'ECVAA System Failure' to the High Grade Service

only. However the Group developed an Alternative solution that extended the provisions to both the High and Low Grade Service. The Modification Group, a majority of industry respondents and the BSC Panel recommended that the P1 Alternative Modification should be approved. The Authority (Ofgem) rejected both the Proposed and Alternative Modification, on the basis that there may be potential for competition in provision of communication services and neither Modification contained a 'sunset clause' that anticipated this. A sunset clause would mean that if competition in provision of communications was realised it would remove the need for any communication failure provisions as the risk would then be borne by the Party in its own contracts.

Existing High Grade ECVAAs (excl. ECVAAs Web)

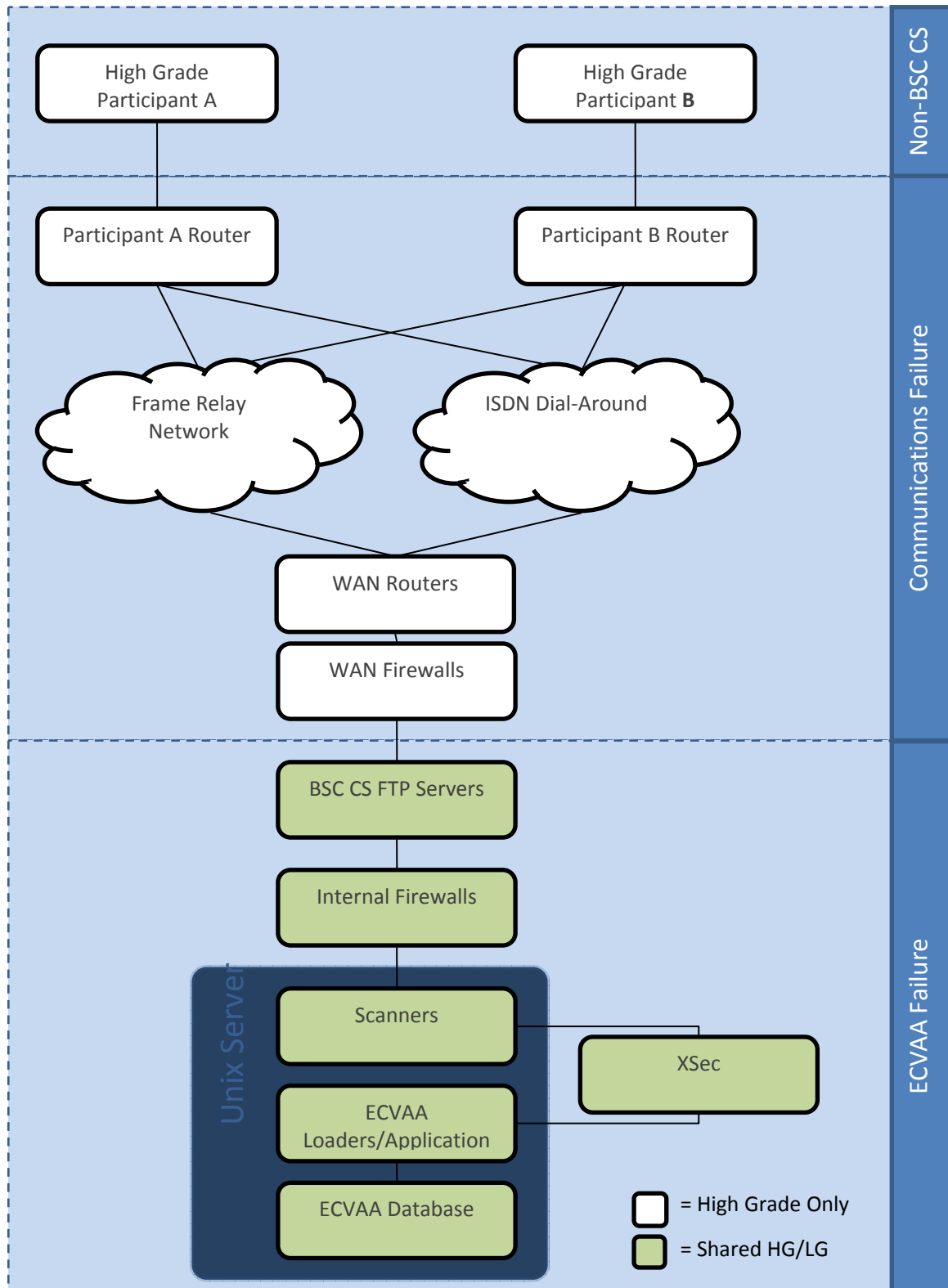


Figure 1 – Communications via the High Grade service

1.2 Modification Proposal

The Proposer has identified two areas of concern:

1. 'A failure of the centrally provided communications systems is beyond the control of BSC parties, and as such, parties should not be financially disadvantaged if the communications network fails. Therefore the provisions permitted under a central ECVAA System Failure should be extended to the centrally provided communications network.'
2. 'If parties are unable to make contract notifications, they may choose not to contract forward, thereby increasing overall costs, by requiring the SO to undertake more expensive actions within the balancing mechanism.'

Proposed Solution:

Building upon the P1 solution

P227 was raised on 24 September 2008 by APX Commodities (the 'Proposer') and seeks to extend the definition of the 'ECVAA system' to include the centrally provided communications network. This would mean that Parties would have the ability to submit notifications after a communications failure had occurred and avoid Imbalance charges. A definition for the revised boundary of the ECVAA system was developed as part of Alternative Modification P1 as follows: "the definition of the ECVAA system would be redefined as the boundary for the High Grade Service to include the router at the participant site but not any source of power for the router. The Party System Boundary for the Low Grade Service would be redefined to include the Internet interface of the Internet Portal by which the ECVAA System is connected to the Internet." The Group will need to consider whether this definition remains appropriate or refine the definition to describe the agreed boundary for where the 'system' begins.

Additionally Alternative Modification P1 sought to change the definition of 'ECVAA System Failure' to 'Notification System Failure'. The P227 Group should consider whether this is a better definition and whether there are any impacts on the BSC Services Agreement arising from expanding the definition of 'ECVAA System'.

Sunset Clause

In their rejection letter the Authority took the view that the communications service should, in due time, be open to competition, where it is efficient and economic to do so. This will enable participants to have control over the communications facilities they receive and allow participants to develop reliable management strategies to their individual requirements.

The Authority recognised that, at that time, "parties have no choice in provision of communications service provider" and therefore was supportive in principle of the solution.

The P227 Proposer notes that the industry has not yet found justification for multiple communication service providers and additionally a contract for provision of the High Grade Service has been procured via a competitive tender. The Proposer believes this approach to procurement is expected to be the best outcome in terms of service provision and cost as duplicating the service would incur additional cost to industry.

However, in light of the decision on P1, the Proposer asks the Modification Group to give consideration as to whether a 'sunset clause' should be included within the modification. It is expected that through engagement with industry views and Ofgem during the process the Group should be able to ascertain whether a sunset clause is appropriate. However should the Panel or Group feel a formal response from Ofgem via provisional thinking be required, the Assessment timetable may need to be extended.

Applicable BSC Objectives

Through providing a mechanism to resubmit notifications in the event of a communications failure the Proposer believes that the potential impact on the SO would be avoided, as well as being more efficient from BSC systems perspective. Therefore the Proposer believes the modification furthers Applicable BSC Objectives (b) and (d).

Other circumstances leading to an inability to submit notifications

In January 2006 ELEXON noted in a paper to the Imbalance Settlement Group (ISG) that it may be possible to introduce a generic 'manual resubmission process' for notifications. It was noted that such a provision could be allowed in certain circumstances. For example, as well as failure of the communications network this process could mitigate against risk for Parties during a BSC Systems Planned Outage.

Prior to a Planned Outage, Parties are requested to submit all notifications for the outage period which are processed by ECVA. Should any plant fail during the Planned Outage a Generator would have a significant risk of exposure to Imbalance due to the fact that there is no method of electronic data submission into the ECVA System until the end of outage. As a result Parties are unable to balance their contracted position which leads to potential large imbalances and associated charges.

However, with Manual Resubmission Process, Parties would be able to correct their contracted positions even in the Planned Outage period.

By using the existing Manual Resubmission process outlined in Section P and applying it in the event of either a Communications Failure or a Planned Outage, P227 could resolve both operational issues with one change to the BSC. The Panel may ask the Modification Group to consider whether this is a matter that can be resolved as part of a potential Alternative to this Modification.

2 AREAS FOR CONSIDERATION IN PROGRESSING MODIFICATION PROPOSAL

An initial assessment of P227 has identified the following areas which BSCCo recommends should be considered further during the progression of the Modification Proposal:

- Identify the the ECVA resubmissions process:
 - Benefits and costs of a resubmission process;
 - Confirm if the resubmission process should fully mirror the current resubmission process;

- Define the boundary for extension of the 'system failure';
- Analyse the impact of historic communications failures;
 - Identify the volume of the contracts which failed to be processed and the resultant Imbalance charges;
 - Identify the frequency of such failures occurring;
- Identify impacts on:
 - ECVAAs Systems;
 - Party Systems/Party Agents Systems;
 - BSCCo processes;
- Appropriateness of a 'Sunset Clause';
- Quantification of the benefits/disadvantages P227;
- Qualitative assessment of impacts on greenhouse emissions;
- Consider the Alternative for broader authority for manual resubmission and other Alternatives;
- Whether the Proposed and Alternative solutions better meet the Applicable BSC Objectives.

3 RATIONALE FOR BSCCO'S RECOMMENDATIONS TO THE PANEL

BSCCo believes that further consideration of P227 by a Modification Group is required in order to further consider, and consult upon, the areas raised by this IWA. As the areas for consideration are sufficiently defined, BSCCo recommends that P227 proceed to the Assessment Procedure.

BSCCo recommends that P227 be submitted to a 2-month Assessment Procedure. This Assessment can be achieved by conducting an Impact Assessment and Consultation in parallel and is based on the following assumptions:

- the Group builds upon the work of P1 and that no Alternative solution with significant system impacts is developed; and
- no provisional thinking is formally requested from the Authority.

It is estimated that progression of P227 will require:

- 3 Modification Group meetings;
- 1 BSC Agent impact assessment;
- 1 industry consultation;
- 1 Party/Party Agent impact assessment;
- 1 Core Industry Document Owner impact assessment;
- 1 BSCCo impact assessment; and

- 1 request for Transmission Company analysis.

The proposed timetable and estimated costs for the progression of P227 are shown in Appendix 3.

BSCCo recommends that the P227 Modification Group be formed from members of the SSMG, whose areas of expertise include ECVAAs systems and processes.

BSCCo recommends that the areas for consideration raised by this IWA should form the basis of the Modification Group Terms of Reference, along with any additional areas proposed by the Panel.

4 TERMS USED IN THIS DOCUMENT

Other acronyms and defined terms take the meanings defined in Section X of the Code.

| Acronym/Term | Definition |
|--------------|--|
| ECVAA | Energy Contract Volume Aggregation Agent |
| ECVNAA | Energy Contract Volume Notification Agent |
| MVRNA | Meter Volume Reallocation Notification Agent |

5 DOCUMENT CONTROL

5.1 Authorities

| Version | Date | Author | Reviewer | Reason for Review |
|---------|----------|-----------------|-------------|----------------------|
| 0.1 | dd/mm/yy | Bu-Ke Qian | David Jones | For peer review |
| 0.2 | dd/mm/yy | | | For technical review |
| 0.3 | dd/mm/yy | | | For quality review |
| 1.0 | dd/mm/yy | Change Delivery | | For Panel decision |

5.2 References

| Ref. | Document Title | Owner | Issue Date | Version |
|------|--|-------|------------|---------|
| 1 | Modification Proposal P1 | | 27/03/07 | 1.0 |

APPENDIX 1: MODIFICATION PROPOSAL

| | |
|---|-------------|
| Modification Proposal – BSCP40/03 | MP No: P227 |
| Title of Modification Proposal <i>(mandatory by originator)</i> : Extension Of The Definition Of ECVAA Systems to include the centrally provided communications network. | |
| Submission Date <i>(mandatory by originator)</i> : 24 th September 2008 | |
| Description of Proposed Modification <i>(mandatory by originator)</i> The definition of the ECVAA systems should be extended to include the centrally provided communications network, and any subsequent failure of any part of the centrally provided components that affects parties ability to submit contract notifications should be considered as an ECVAA system failure. A definition for the revised boundary of the ECVAA system was developed as part of alternative modification P1: “the definition of the ECVAA system would be redefined as the boundary for the High Grade Service to include the router at the participant site but not any source of power for the router. The Party System Boundary for the Low Grade Service would be redefined to include the Internet interface of the Internet Portal by which the ECVAA System is connected to the Internet.” | |
| Description of Issue or Defect that Modification Proposal Seeks to Address <i>(mandatory by originator)</i> A failure of the centrally provided communications systems is beyond the control of BSC parties, and as such, parties should not be financially disadvantaged if the communications network fails. Furthermore, if parties are unable to make contract notifications, they may choose not to contract forward, thereby increasing overall costs, by requiring the SO to undertake more expensive actions within the balancing mechanism. | |
| Impact on Code <i>(optional by originator)</i> The impact on the Code would be to require a change to Part P section 5. | |
| Impact on Core Industry Documents or System Operator-Transmission Owner Code <i>(optional by originator)</i> | |
| Impact on BSC Systems and Other Relevant Systems and Processes Used by Parties <i>(optional by originator)</i> | |
| Impact on other Configurable Items <i>(optional by originator)</i> | |

Justification for Proposed Modification with Reference to Applicable BSC Objectives *(mandatory by originator)*

This modification is very similar to the alternative modification proposal developed as a result of OM London Exchange submitting modification P1 – “Extension Of The Definition Of ECVAA Systems Failure For Permitting Post Gate Closure Notification”. The BSC Panel recommended that this alternative be approved. Ofgem rejected both the original and alternative modifications.

In their rejection letter Ofgem took the view that the communications service should, in due time, be open to competition, where it is efficient and economic to do so. Provision of competition would allow parties to make their own choice of communications provider and thereby manage their own risk.

However, they recognised that, at that time, parties have no choice in provision of communications service provider. They suggested that: “As an interim measure, until competition can be introduced into the provision of the relevant parts of the Communications Services, Ofgem considers that the provisions for ECVAA System Failures should be extended to the centrally provided elements of the Communications Services as proposed by the Modification Report. Ofgem believes that this would allocate the risks of communication failure more efficiently within the current arrangements.” However, as neither the original or alternative modification had a “sunset clause” within it, they rejected the modification.

Since the Ofgem P1 decision letter, the industry has not yet found justification for multiple communication service providers. The industry has just recently chosen to replace the high grade service and this has been procured via a competitive tender. This approach to procurement is expected to be the best outcome in terms of service provision and cost. Duplicating the service would obviously improve the redundancy of the network, but the additional cost to consumers that this would incur is not justified. Nevertheless, in light of Ofgem’s decision on mod P1, the modification assessment group should give due consideration as to whether a ‘sunset clause’ should be included within the modification.

This modification therefore furthers Applicable BSC Objectives (b), (the efficient, economic and co-coordinated operation by the licensee of the licensee’s transmission system), and (d), (promoting efficiency in the implementation and administration of the balancing and settlement arrangements).

Urgency Recommended: No *(delete as appropriate) (optional by originator)*

| |
|---|
| Justification for Urgency Recommendation (mandatory by originator if recommending progression as an Urgent Modification Proposal) |
| Details of Proposer: <i>Name.....Ian Moss.....</i> <i>Organisation.....APX Commodities.....</i> <i>Telephone Number....020 7841 5627.....</i> <i>Email Address.....i.moss@apxgroup.com.....</i> |
| Details of Proposer's Representative: <i>Name.....Ian Moss.....</i> <i>Organisation.....APX Commodities.....</i> <i>Telephone Number....020 7841 5627.....</i> <i>Email Address.....i.moss@apxgroup.com.....</i> |
| Details of Representative's Alternate: <i>Name.....Frank Thompson.....</i> <i>Organisation..... APX Commodities</i> <i>Telephone Number.....020 7841 5652.....</i> <i>Email address.....f.thompson@apxgroup.com.....</i> |
| Attachments: No (delete as appropriate) (mandatory by originator) If Yes, Title and No. of Pages of Each Attachment: |

APPENDIX 2: INITIAL ASSESSMENT OF IMPACTS OF MODIFICATION PROPOSAL

An initial assessment has been undertaken by BSCCo in respect of all BSC systems, documentation and processes. The following have been identified as being potentially impacted by P227.

a) Impact on BSC Systems and Processes

| BSC System / Process | Potential Impact of Proposed Modification |
|----------------------|--|
| Service Delivery | Management of Operational Issues arising from Communications failures. |

b) Impact on BSC Agent Contractual Arrangements

| BSC Agent Contract | Potential Impact of Proposed Modification |
|----------------------------------|---|
| BSC Services Agreement - (ECVAA) | Consideration as to whether any changes to the contractual terms are required. Definition of 'ECVAA System' may be redefined. |

c) Impact on BSC Parties and Party Agents

BSC Parties, ECVNAs and MVRNAs will need to consider the impacts on extending their processes to include resubmission in the event of a broader definition of system 'failure'.

d) Impact on Transmission Company

None expected.

e) Impact on BSCCo

| Area of Business | Potential Impact of Proposed Modification |
|-----------------------------|--|
| Central Services Operations | Amendments to operational working processes. |
| Change Implementation Team | Documentation changes will be done by the Release Team for the Implementation |
| Corporate Assurance | Implementation Support |
| Disputes | Potential for increase in Dispute activity depending on definition of 'system' boundary. |

f) Impact on Code

| Code Section | Potential Impact of Proposed Modification |
|--------------|---|
| Section P | Impact on Section P5 describing the nature and consequences of an ECVAAs System Failure |
| Section X | Potential new definitions or revised definitions of 'ECVAAs System'. |

g) Impact on Code Subsidiary Documents

| Document | Potential Impact of Proposed Modification |
|-------------------------------------|--|
| ECVAAs Service Description | Impact on definition of ECVAAs System Failure and ECVAAs obligations in managing such a failure. |
| Communications Requirement Document | Impact on actions to be taken in the event of a communications failure. |

h) Impact on Core Industry Documents and Other Documents

No impact.

i) Impact on Other Configurable Items

| Document | Potential Impact of Proposed Modification |
|------------|--|
| ECVAAs URS | Impact on lower-level system requirements for managing communications failure and submission of notifications. |

j) Impact on BSCCo Memorandum and Articles of Association

No impact.

k) Impact on Governance and Regulatory Framework

No impact.

APPENDIX 3: COSTS AND TIMETABLE FOR PROGRESSION**ESTIMATED COSTS OF PROGRESSING MODIFICATION PROPOSAL³**

| | |
|-------------------------------|-------------------------|
| Meeting Cost | £ 1,500 |
| Legal/Expert Cost | £ 0 |
| Impact Assessment Cost | £ 0 |
| ELEXON Resource | 64 man days £ 13,250 |

³ Clarification of the meanings of the cost terms in this appendix can be found on the BSC Website at the following link:
http://www.elexon.co.uk/documents/Change_and_Implementation/Modifications_Process_-_Related_Documents/Clarification_of_Costs_in_Modification_Procedure_Reports.pdf

| ID | Task Name | Duration | Start | Finish |
|----|-----------------------------|----------|--------------|--------------|
| 8 | | | | |
| | | | | |
| 1 | IWA Presented to Panel | 1 day | Thu 09/10/08 | Thu 09/10/08 |
| 2 | MG Meeting 1 | 1 day? | Mon 13/10/08 | Mon 13/10/08 |
| 3 | MG Meeting 2 | 1 day? | Mon 20/10/08 | Mon 20/10/08 |
| 4 | Draft Requirement Spec | 5 days | Tue 21/10/08 | Mon 27/10/08 |
| 5 | Draft Consultation Document | 5 days | Tue 21/10/08 | Mon 27/10/08 |
| 6 | MG Review | 4 days | Tue 28/10/08 | Fri 31/10/08 |
| 7 | Impact Assessment | 10 days | Mon 03/11/08 | Fri 14/11/08 |
| 8 | Consultation | 10 days | Mon 03/11/08 | Fri 14/11/08 |
| 9 | Draft Legal Text | 10 days | Mon 03/11/08 | Fri 14/11/08 |
| 10 | MG Meeting 3 | 1 day? | Wed 19/11/08 | Wed 19/11/08 |
| 11 | Draft Assessment Report | 4 days | Thu 20/11/08 | Tue 25/11/08 |
| 12 | MG review | 4 days | Wed 26/11/08 | Mon 01/12/08 |
| 13 | Panel Paper Day | 1 day? | Fri 05/12/08 | Fri 05/12/08 |