



National Grid Company, BSC
Signatories and Other Interested
Parties

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28 January 2005

Dear Colleague,

Modification to the Balancing and Settlement Code ("BSC") - Decision and notice in relation to Modification Proposal P167 "Erroneous Calculation of Bid Offer Acceptance ("BOA") Volume"

The Gas and Electricity Markets Authority (the "Authority")¹ has carefully considered the issues raised in the Modification Report² in respect of Modification Proposal P167, "Erroneous Calculation of Bid Offer Acceptance ("BOA") Volume".

The BSC Panel (the "Panel") recommended to the Authority that Proposed Modification P167 should not be made, but in the event that the Authority determines that Proposed Modification P167 should be made, the Panel recommended an implementation date of 1 March 2005 if an Authority decision is received on or before 29 April 2005, or 28 June 2006 if an Authority decision is received after 29 April 2005 but on or before 26 August 2005.

Having carefully considered the Modification Report and the Panel's recommendation and having regard to the Applicable BSC Objectives³ and the Authority's wider statutory duties,⁴ the Authority has decided not to direct a Modification to the BSC.

¹ Ofgem is the office of the Authority. The terms "Ofgem" and "the Authority" are used interchangeably in this letter.

² ELEXON document reference P167RR, Version No. FINAL/1.0, dated 16 November 2004

³ The Applicable BSC Objectives, as contained in Standard Condition C3 (3) of NGC's Transmission Licence, are:

- a) the efficient discharge by the licensee of the obligations imposed upon it by this licence;
- b) the efficient, economic and co-ordinated operation by the licensee of the licensee's transmission system;
- c) promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity;
- d) promoting efficiency in the implementation and administration of the balancing and settlement arrangements
- e) the undertaking of work by BSCCo (as defined in the BSC) which is:
 - (i) necessary for the timely and effective implementation of the proposed British Electricity Trading and Transmission Arrangements (BETTA); and
 - (ii) relevant to the proposed GB wide balancing and settlement code; and does not prevent BSCCo performing its other functions under the BSC in accordance with its objectives.

⁴ Ofgem's statutory duties are wider than the matters that the Panel must take into consideration and include amongst other things a duty to have regard to social and environmental guidance provided to Ofgem by the government, a duty to contribute to the achievement of sustainable development and a duty to have regard to the principles of best regulatory practice.

This letter explains the background and sets out the Authority's reasons for its decision.

Background

The electricity trading arrangements are designed to ensure that there are sufficient incentives on participants to balance their individual trading positions and minimise the costs to NGC, as System Operator ("SO"), of balancing the Transmission System ("System"). Market participants can contract ahead in the forwards, futures and short-term markets to balance their contract position ahead of Gate Closure (one hour before real time). Gate Closure is the last point at which Parties can notify their contract positions to NETA⁵ Central Systems. In addition, before Gate Closure, Parties must submit their Final Physical Notifications ("FPN") to the SO, indicating to the SO, the Parties' intended level of generation or consumption. Parties may not amend their FPN following Gate Closure.

At Gate Closure, the SO uses the Balancing Mechanism ("BM") to enable it, amongst other things, to keep the System in electricity balance close to, and in, real time by adjusting levels of generation and demand in the light of the Bids and Offers submitted. For each Settlement Period the metered volumes for each Trading Party are used to determine if the actual volumes taken from, or put onto the System, match their notified contractual volumes. Parties with a position of energy imbalance (i.e. where a parties metered volumes does not match the notified contract volume), are exposed to an imbalance charge for the relevant Settlement Period.

In order to determine the level of imbalance charges for each Party, as well as other Trading Charges⁶ to which Parties are exposed, each Parties metered volume and contracted volume is required. If a Bid or an Offer is accepted by the SO on one of the Parties BM Units, the volume of energy associated with the Bid Offer Acceptance (BOA) is also required. The BSC settlement system does not receive data from the SO on BOA volumes and therefore the settlement process calculates these volumes by subtracting the bid level from the FPN submitted for each BM Unit prior to Gate Closure.

The Proposed Modification

Proposed Modification P167 was raised by British Gas Trading on 28 June 2004. The Proposer was of the view that, whilst Parties may not amend their FPN following Gate Closure, Parties may re-declare their Maximum Export Level ("MEL") or Minimum Import Level ("MIL"). It was the view of the Proposer that, in circumstances where a Party has re-declared its MEL below its FPN or re-declared its MIL above its FPN after Gate Closure, it would be the MEL or MIL rather than the FPN that would more accurately reflect the intended physical position of the Party. The Proposer was of the view, therefore, that in such circumstances, the existing method for deriving BOA volumes by subtracting the bid level from the FPN will no longer be valid, as it would tend to overstate the BOA volume.

⁵ New Electricity Trading Arrangements

⁶ Section T of the BSC concerns Settlement and Trading Charges. All Trading Parties, including the SO have a liability to pay, and an entitlement to receive, the amounts of the Trading Charges determined in accordance with section T. These Trading Charges include the BM Unit Cashflow (payments to Trading Parties that have an Offer accepted in the BM and payments by Trading Parties that have a Bid accepted in the BM); the Energy Imbalance Cashflow (payments at System Buy Price ("SBP") by Trading Parties that are short and payments at System Sell Price ("SSP") to Trading Parties that are long and the System Operator BM Cashflow (typically a payment by the Transmission Company to cover the net cost of Offer and Bid Acceptances).

The Proposer was of the view that incorrectly deriving the BOA volume in this way could lead to Parties being exposed to incorrect Trading Charges. The Proposer was of the view that an anomalous BOA volume would lead to an incorrect Credited Energy Volume (“CEV”) for the relevant Party which in turn could lead to a change in the Party’s imbalance position (i.e. cause the Parties imbalance position to be ‘longer’). In addition, the Proposer considered that an anomalous BOA volume could lead to over payment to/from the Party that received the BOA. Further, since the BOA would go forward to form part of the Net Imbalance Volume⁷ (“NIV”), it could also alter the imbalance exposure of other Parties.

Proposed Modification P167 seeks to address this perceived ‘defect’⁸ by amending the methodology for calculating BOA volumes in the BSC, to account for changes in BM Unit MEL and MIL. The Proposed Modification seeks to ensure that BOA volumes are calculated with reference to the output level against which the SO makes its BOA instruction (which is likely to be the FPN except in cases where a Party has re-declared its MEL below its FPN or re-declared its MIL above its FPN after Gate Closure), such that the ‘correct’ BOA volumes are fed into the settlement calculations. In order to facilitate this, the Proposed Modification requires implementation changes to the BSC to introduce a new parameter, the Acceptance Reference Level (“ARL”), which would allow Acceptance Volumes to be calculated with reference to the physical dynamics of the BM Unit prevailing at the time the acceptance is instructed.

The Proposer considered that Proposed Modification P167 would better facilitate achievement of Applicable BSC Objective (c) on the basis that removing the defect in the calculation of BOA volumes would ensure that Parties are exposed to the appropriate level of Trading Charges and would therefore promote effective competition in the generation and supply of electricity and promote such competition in the sale and purchase of electricity.

The Panel recommended that Proposed Modification P167 be submitted to a two month Assessment by the Settlement Standing Modification Group (“SSMG”).

The SSMG met four times during the Assessment of the Proposed Modification (on 15 July, 5 August, 27 September and 5 October 2004). Following BETTA Go-Active on 1 September 2004, the Assessment of Proposed Modification P167 was extended by one month. Elexon re-issued the consultation document on 7 September 2004, for participants to consider P167 on a GB basis.

SSMG views

The following summarises the substantive comments raised by the SSMG:

Non- Delivery calculations

The SSMG considered that the current baseline did not recognise the possibility of an acceptance being issued from an output level other than FPN and therefore considered that the

⁷ The NIV is calculated by netting off all purchase actions against all sell actions to give the imbalance of the overall system.

⁸ Ofgem notes that some members of the Settlement Standing Modification Group (SSMG) did not consider the anomaly in the calculation of BOA volumes to be a ‘defect’ under the current arrangement, but an anomaly in the BOA volume calculations. Ofgem acknowledges these views, and notes that for simplicity, the use of the term defect in this decision letter refers to the perceived defect in BOA volume calculations as considered under Proposed Modification P167.

current baseline may not accurately represent Non-Delivery in such scenarios. The SSMG also considered that amending the Non-Delivery calculation under Proposed Modification P167 would provide a more accurate estimation of non-delivery than the current baseline. However, due to the limitations on Metered Volume information, the SSMG recognised that some scenarios would still not be accurately represented by the proposed Non-Delivery calculation.

Estimated costs of Proposed Modification P167

It was noted by the SSMG that under Proposed Modification P167 there would be an impact on Parties (verifying the amended Settlement calculations) and on the BSC Systems (associated with the inclusion of MIL and MEL into the Settlement Calculation).

As part of the Impact Assessment in respect of the Proposed Modification, it was estimated that, in relation to BSC Agent costs, it would cost between £350k and £600k (the difference between these values being the Fixed Release cost) to update their systems to include MIL and MEL into the settlement calculation, as required by Proposed Modification P167. In terms of Party costs, it was estimated that it would cost between £75k and £100k for Parties to update their systems, in particular to account for the timing of MEL and MIL submissions when verifying settlement calculations. In relation to BSCCo costs, it was estimated that, in terms of implementation effort and operational impact, the Proposed Modification would cost between £75k and £135k. Finally, in relation to SO costs, it was estimated that it would cost £470k to implement the changes necessary for the Proposed Modification.

Materiality estimates

In respect of the materiality of the defect, the SSMG estimated the net benefit received by directly affected Parties under the current baseline to be between £100-400k per annum. The analysis was undertaken by estimating live occurrences of the defect in respect of overstated Bid volumes (MEL redeclared below FPN) as this was considered to be the most common form of the anomaly.

The SSMG made a number of assumptions in order to estimate the materiality of the defect and as such the SSMG considered that its estimate was more of an indicative guide to the potential materiality rather than a definite assessment of it.

The SSMG also noted that the materiality estimates represented the impact on cash flows within the market, rather than a potential saving available to the industry as a whole. Therefore the materiality estimates were not considered to allow comparisons with the implementation costs to derive a cost / benefit.

Imbalance cashflow and imbalance prices

The SSMG considered that the defect resulted in a net flow of cash from the consumption side to the production side of the market (such that the implementation of Proposed Modification P167 would result in a new cashflow from production to consumption).

The SSMG considered the impact of the defect on Parties with different portfolio types. The SSMG was of the view that suppliers were currently receiving a net dis-benefit from the defect and therefore would financially benefit from an implementation of Proposed Modification P167;

vertically integrated participants (with equal generation and supply assets) were neutral to the defect; and generators (participating in the BM and directly affected by the perceived anomaly) were currently receiving a net benefit from the defect and would receive a financial dis-benefit were Proposed Modification P167 to be implemented.

In the period from 20 March to 12 April and the period from 28 June to 21 July 2004, (comprising approximately 2300 Settlement Periods) the number of Settlement Periods identified by the SSMG as potentially affected by the defect was 816 (approximately 35% of the total Settlement Periods). In over 97% of these Settlement Periods the impact of the defect on imbalance prices was less than £0.25. Only seven Settlement Periods were identified by the SSMG as having both a potentially material impact on the imbalance prices.

For Settlement Periods in 48 of the Settlement Days considered, which had been flagged as being potentially affected by the defect, the SSMG estimated that the impact on imbalance prices in terms of absolute imbalance payments made by Parties was £327,000 per annum. In order to put this figure into context, the SSMG noted that the total absolute Imbalance Payments was of the order of £200m per annum. One SSMG member noted that the actual figure could be substantially higher than the estimate, since the analysis was based on data for summer Settlement Periods and that the impact may be more substantial during winter months (due to typically higher Imbalance Charges over these periods).

Potential to exploit the anomaly

The SSMG considered that the potential for Parties to exploit the defect (i.e. re-declaration of MEL/MIL below/above FPN in order to avoid imbalance) to gain a commercial advantage was limited for a number of reasons, including:

- it cannot be consistently predicted whether the SO is going to take a Bid on a specific BM Unit;
- the Bid price would have to be below the relevant energy imbalance price for there to be any advantage from re-declaring MEL below FPN;
- it is difficult for Parties to predict the length of the market in a given Settlement Period; and
- the bid price would have to be 'favourable' to the SO to make the Bid attractive and therefore increase the possibility of it being called (potentially reducing the 'profit' for the BM Unit when the Bid is called outside of the circumstances when this issue arises).

The SSMG noted that the analysis of live occurrences had not shown any indication of Parties exploiting the anomaly to date and going forward the SSMG considered that the possibility for exploitation to be extremely limited.

MIL/MEL

In regard to MIL and MEL submissions in the settlement calculation, the majority of the SSMG agreed that by including and formulating MIL and MEL data submissions in the BSC, as put forward by the Proposed Modification, it would place a commercial driver on, and therefore could potentially negatively impact, the submission of MIL/MEL data to the SO.

In addition, the majority of the SSMG agreed that the existing MIL/MEL data submission process would not need to be amended under Proposed Modification P167, and as such the SSMG considered that only a small amount of pre-processing would continue to be required by the SO.

Applicable BSC Objectives

With reference to the Applicable BSC Objectives, it was the view of the SSMG that the Proposed Modification would:

- improve the accuracy to which imbalance positions are reported and the level of imbalance to which Parties are exposed;
- ensure that all Parties receive appropriate Residual Cashflow Reallocation Cashflow (RCRC) payments;
- appropriately calculate imbalance prices; and
- remove any possibility of exploitation of the defect (although the SSMG concluded that there was no evidence of current exploitation in this respect).

The SSMG therefore considered that Proposed Modification P167 would better facilitate achievement of Applicable BSC Objective (c) for promoting effective competition in the generation and supply of electricity and promoting such competition in the sale and purchase of electricity.

However, the SSMG also considered that there would be an impact on, and an associated cost for, Parties and NGC under Proposed Modification P167, which would not better facilitate achievement of Applicable BSC Objective (c).

The SSMG was of the view that implementation of Proposed Modification P167 would require central systems costs to be incurred and would increase the complexity of the settlement arrangements, which would not better facilitate achievement of Applicable BSC Objective (d) for promoting efficiency in the implementation and administration of the balancing and settlement arrangements.

In addition, the SSMG also considered that changing the MEL and MIL parameters from operational terms under the Grid Code into trading parameters under the BSC may potentially have a detrimental effect on Parties' MEL and MIL submissions to the SO, since it would introduce a commercial driver into MIL/MEL submissions. The SSMG considered the potential change in generators' actions could reduce the SO's ability to use the MEL submissions as an indicator of generation volume, and could therefore have a potentially detrimental impact on the achievement of Applicable BSC Objective (b) for the efficient, economic and co-ordinated operation by the licensee of the licensee's transmission system.

It was the view of the majority of the SSMG that the materiality of the defect was not sufficient to justify the cost of implementation. The majority of the SSMG therefore considered that Proposed Modification P167 would not, on balance, better facilitate achievement of the Applicable BSC Objectives. A minority of the SSMG who were in support of Proposed Modification P167, including the Proposer, were of the view that the cost of implementation did not outweigh the benefits of the Proposed Modification and therefore, on balance, the Proposed Modification would better facilitate achievement of the Applicable BSC Objectives.

Respondents' views

Two consultations were undertaken as part of the Assessment of Proposed Modification P167. The first consultation was issued under the England & Wales baseline and the second on a GB wide basis. Elexon received ten responses from both consultations. Two respondents (representing 5 Parties) expressed support for the Proposed Modification. Seven respondents (representing 48 Parties) did not support the Proposed Modification, whilst one respondent (representing 1 Party) remained undecided.

The following summarises the substantive comments raised:

The majority of respondents did not support Proposed Modification P167 and considered Proposed Modification P167 would not better facilitate achievement of the Applicable BSC Objectives.

Defect in the current baseline

The respondents who did not support Proposed Modification P167 were split between; those who did not consider there to be a defect in the current baseline, but instead considered there to be an anomaly in BOA volume calculations; and respondents who considered that there was a defect in the calculation of BOA volumes that 'in principle' should be addressed.

A number of respondents considered that the anomaly in the BOA volume calculations had been known since NETA Go-live, and had been incorporated in the electricity trading arrangements without causing significant distortion or level of concern.

Cost / benefit

A number of respondents that were not in favour of the Proposed Modification were of the view that the overall impact of the defect is small compared to the cost of implementing a solution such as the Proposed Modification. In contrast, the view was expressed by those in favour of the Proposed Modification that the overall impact of the defect is significant and justifies the cost of implementing a solution.

Potential to exploit the anomaly

The majority of respondents considered that the potential for exploiting the anomaly identified under the Proposed Modification would be limited. A number of these respondents expressed the view that there are too many variables involved for the anomaly to be efficiently exploited and noted that the analysis had not indicated that exploitation was occurring. In addition, a number of respondents considered that the implementation of the Proposed Modification may increase the potential for exploitation, by encouraging Parties to manipulate MEL and MIL submissions to obtain a commercial advantage.

MEL and MIL submission

The majority of respondents were of the view that implementation of Proposed Modification P167 would have a detrimental effect on submission of MEL and MIL data. These respondents were of the view that using MEL and MIL data within settlement would place a commercial

driver on submission of the data and could result in less accurate and timely information being provided to the SO. In contrast, a number of respondents were of the view that the Grid Code provisions relating to the submission of MEL/ MIL data would provide assurance that Parties would continue to submit such data in a timely and accurate manner.

Impact on imbalance prices

The majority of consultation respondents were of the view that the impact on imbalance prices of the defect identified under the Proposed Modification was not material since few Settlement Periods would be affected, and in the majority of these Settlement Periods the impact would be small. However, the view was also expressed that although changes in individual Settlement Periods were relatively small, the impact of the defect on the market overall may be significant.

Estimated materiality

One of the respondents in support of Proposed Modification P167 considered that the materiality estimates implied that the defect was underestimated during NETA Go-live. This respondent was of the view that an overall benefit would be achieved in the long term as a result of Proposed Modification P167, particularly if the fixed release implementation costs could be efficiently shared with other changes. This respondent therefore considered that Proposed Modification P167 would better facilitate achievement of the Applicable BSC Objectives.

Another respondent in favour of Proposed Modification P167 considered that if the modification was not approved, Elexon should continue to monitor the issue and refine their materiality estimation method to ensure that the anomaly is not being excessively exploited.

ELEXON published a draft Modification Report on 22 October 2004, which invited respondents' views by 29 October 2004. Six responses were received. One respondent (representing 1 Party) expressed support for the Proposed Modification. One respondent (representing 1 Party) provided a response of no comment. Four respondents (representing 33 Parties) did not support the Proposed Modification. No new, substantive issues were raised in response to this consultation.

Panel's recommendation

The Panel met on 18 November 2004 and considered Modification Proposal P167, the draft Modification Report, the views of the SSMG and the views of consultation respondents. The Panel recommended that the Proposed Modification would not better facilitate achievement of the Applicable BSC Objectives; and recommended to the Authority that the Proposed Modification should not be made. In the event that the Authority determined that Proposed Modification P167 should be made, the Panel recommended that it should be implemented on 1 March 2005 if an Authority decision is received on or before 29 April 2005, or 28 June 2006 if an Authority decision is received after 29 April 2005 but on or before 26 August 2005.

The Panel expressed the view that the Proposed Modification could create commercial incentives for Parties to delay the submission of MEL/MIL data which could have a detrimental effect on the SO's ability to balance the system. In addition, the Panel queried whether implementation cost estimates put forward by the SSMG could be reduced, and noted ELEXON's advice that no cost savings on the figures put forward had been identified as the Proposed

Modification seeks to change the settlement calculations. The Panel expressed concerns that the cost of implementing the Proposed Modification would considerably exceed the benefits of doing so. Further, the Panel noted that the defect had been known about at the time the BSC was originally drafted and that the materiality of it had not been considered sufficient to justify its removal.

Ofgem's view

Having carefully considered the Modification Report, respondents' views and the Panel's recommendation, Ofgem, having had regard to the Applicable BSC Objectives and its statutory duties, considers that Proposed Modification P167 would not better facilitate achievement of the Applicable BSC Objectives.

Applicable BSC Objective (c) – promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity

Ofgem agrees with the majority of the SSMG that under certain circumstances, where MIL/MEL has been re-declared away from FPN before an acceptance is instructed by the SO, the anomaly potentially has the effect of overstating the accepted Bid volume for the BM Unit. Ofgem considers that an overstated Bid volume would have consequential effects on the level of Trading Charges to which Parties are exposed. For instance some, or all, of the imbalance between FPN and MEL would be removed, i.e. the Party would essentially be protected from exposure to imbalance to the extent of the overstated Bid volume. An overstated Bid volume would also have implications for the calculation of NIV, and therefore on the resulting energy imbalance prices, which in turn would have implications on other settlement calculations such as the derivation of RCRC.

In addition, Ofgem agrees with the view of the SSMG that the analysis undertaken shows no evidence of Parties manipulating the anomaly to date. In addition, Ofgem notes that the conclusions of the SSMG indicate that there is only an extremely limited possibility of the anomaly being exploited in the future.

In this respect, Ofgem considers that Proposed Modification P167 could improve the accuracy to which imbalance positions and Parties' levels of imbalance exposure are reported and would therefore improve the accuracy of the level of Trading Charges to which Parties are exposed. Ofgem therefore considers that, in this respect, the Proposed Modification would therefore better facilitate achievement of Applicable BSC Objective (c).

Applicable BSC Objective (b) – the efficient, economic and co-ordinated operation of the transmission System by NGC

Ofgem recognises that there is an obligation under the Grid Code⁹ for Parties to submit timely MIL/MEL data to the SO, and that the generation licence stipulates that market participants must comply with the Grid Code requirements. Ofgem considers that while the Proposed Modification may not substantially change the timings of MIL/MEL submissions to the SO, Ofgem has concerns that formalising the submission of MIL/MEL data in the BSC, by including

⁹ In accordance with OC2.4.2 of the Grid Code – Data Requirements.

MEL and MIL within the settlement calculation, as put forward by Proposed Modification P167, would change the nature of MIL/MEL from operational parameters under the Grid Code into trading parameters under the BSC, and as a result may introduce a commercial driver on MIL/MEL submissions. Ofgem considers that this could potentially have a detrimental impact on the values of MIL/MEL submitted to NGC, which in turn could potentially reduce the SO's ability to use the MIL/MEL figure as a true indicator of generation volume. Ofgem considers that this may have a detrimental impact on the ability of NGC to discharge the obligations placed upon it under the terms of its transmission licence.

In this respect, therefore, Ofgem considers that Proposed Modification P167 could potentially undermine the accuracy of post Gate Closure data submissions, and would therefore not better facilitate achievement of Applicable BSC Objective (b).

Applicable BSC Objective (d) – promoting efficiency in the implementation and administration of the balancing and settlement arrangements

Ofgem agrees with the view of the SSMG and Panel that implementation of Proposed Modification P167 would cause considerable costs to be incurred. Ofgem notes that there would be an impact on Parties costs of between £75-100k per Party, as Parties would be required to update their systems (in particular to account for the timing of MEL and MIL submissions when verifying Settlement calculations). Ofgem also notes the identified costs of £470k for changes to NGC's computer systems and processes. In addition, Ofgem notes the costs (change specific) of £350k and £75k-135k that would be incurred by BSC Agents and BSCCo respectively. Ofgem does not consider that the benefits of implementing the Proposed Modification would outweigh the costs that would be incurred by Parties, therefore reducing efficiency in the implementation of the arrangements.

Ofgem therefore considers that, in this respect, the Proposed Modification would not better facilitate achievement of Applicable BSC Objective (d).

Conclusion

Ofgem acknowledges that an anomaly in the calculation of BOA has been identified by the Proposer. However, Ofgem agrees with the view of the Panel, the SSMG, and the majority of respondents that the materiality of the defect (bearing in mind the SSMG's view that its estimated materiality of the defect should only be considered to be an indicative guide to the potential materiality rather than a definite assessment of it) is not sufficient to outweigh the substantial costs that would be incurred if Proposed Modification P167 was implemented. In addition, Ofgem notes the view of the SSMG and the majority of respondents that the potential for exploitation of the anomaly identified under the Proposed Modification would be limited.

Therefore, on balance, Ofgem agrees with the view of the Panel, the SSMG, and the majority of respondents that Proposed Modification P167 would not better facilitate achievement of Applicable BSC Objectives and has decided not to direct implementation of Proposed Modification P167.

Ofgem also notes that both Elexon and the SO are aware of the anomaly identified by the Proposed Modification and, should the materiality of the anomaly increase in the future such

that the benefits of addressing the defect would outweigh the identified costs, it may be appropriate for this issue to be reconsidered.

If you have any questions, please contact me on the above number or alternatively you can contact Ndidi Njoku on 0207 901 7157.

Yours sincerely,

Jo Witters

Head, Energy Policy

Signed on behalf of the Authority and authorised for that purpose by the Authority