



CP Report – CP1384 & CP1385

Meeting Name	Supplier Volume Allocation Group
Meeting Date	5 February 2013
Purpose of paper	For Decision
Summary	This report provides details of the background, solution, impacts and industry views for CP1384 'Clarification on Disconnection and Associated Processes' and CP1385 'Notification of NHH Energisation Status Change by LDSO'. ELEXON invites the SVG to consider the report and to approve both CPs for implementation in the November 2013 Release.

1. Introduction

We present [CP1384](#) and [CP1385](#) together in this paper as they both impact the same Balancing and Settlement Code Procedures (BSCPs), [514](#)¹ and [515](#)², and in some cases the same sections of these BSCPs.

The CPs have different Proposers, who have requested Implementation Dates. They are not mutually exclusive or dependent on each other, and the SVG could therefore decide to approve both, only one or neither. It is therefore necessary for the SVG to consider the redlining overlaps, and agree the combined BSCP wording if it decides to approve both CPs. In addition, implementation at the same time would benefit participants as this would be easier and more efficient. If the SVG does approve both CPs, it should therefore consider the appropriate Implementation Date(s).

Below we describe the background, solution, impacts and industry views for each CP. CP1384 is covered by sections 2 to 7, and CP1385 is covered by sections 8 to 13. These sections include the individual recommendations for each CP. Section 14 contains the overall recommendations that we ask the SVG to consider if it wishes to approve both CPs.

¹ BSCP514 'SVA Meter Operations for Metering Systems Registered in SMRS'.

² BSCP515 'Licensed Distribution'.

2. CP1384 - Why Change?

Background

Currently BSCP515 (section 3.7) states that:

- “Prior to any SVA disconnection, the Supplier will normally instruct their MOA [Meter Operator Agent] to de-energise the Metering System in accordance with Section 3.6 ‘De-energisation of a Metering System (SVA Only)’. Where this has not occurred prior to the disconnection request, the LDSO [Licensed Distribution System Operator] may reject the disconnection request or, if the disconnection needs to be carried out at short notice, liaise with the appointed MOA to arrange for removal and recovery of the Meter and sending of the necessary flows.”

There are several scenarios associated with the disconnection process:

- Short-notice disconnections, such as where the LDSO disconnects in an emergency;
- Supplier-led disconnections, where the Supplier requests that the LDSO disconnects; and
- LDSO-led, where the consumer (usually a developer) contacts the LDSO directly to seek disconnection.

Any of these may be single or bulk (two or more Metering Systems) disconnections.

BSC Audit findings

For the 2011/2012 audit year ending 31 March 2012, the BSC Auditor noted no issues with the short-notice disconnections process.

However it did note two main problems caused by a lack of clarity in BSCP515 ([market issue 1922](#)) that continues to impact a number of LDSOs in the following ways:

- Issues where no de-energisation is undertaken before disconnection; and
- Inconsistencies in working practices between the bulk and single disconnections.

These are outlined below.

What is the issue?

No de-energisation before disconnection

The BSC Auditor found that, in circumstances where Suppliers had requested a disconnection without first requesting a de-energisation, many LDSOs were not rejecting the disconnection requests. Where the MOA has not de-energised before the engineer attends the site to disconnect, it can decide not to carry out the disconnection – this may also happen for LDSO-led disconnections. This results in wasted time and effort, and can be disruptive to the consumer. The LDSO will subsequently approve and carry out the disconnection request once de-energisation has been confirmed.

The issue is that BSCP515 Section 3.7 'Disconnections' does not mandate the Supplier to instruct its MOA to de-energise the Metering System prior to a request to disconnect; it merely says that it "normally" would. As single disconnections are led by Suppliers and bulk by LDSOs, this allows for Suppliers de-energising sites on single disconnections, but not necessarily doing so for bulk disconnections.

Equally, it allows for the LDSO to reject a disconnection request if the Metering System has not been de-energised, but it does not mandate that it should reject the request. This ambiguous wording does not provide sufficient clarity on the process to be undertaken.

Inconsistencies between the bulk and single disconnections

The BSC Auditor also noted that a number of LDSOs are processing bulk and single disconnections differently since the implementation of the Master Registration Agreement's (MRA) working practices (WP) relating to disconnections initiated by bulk and LDSOs. MRA WP151 sets out a notice period for LDSOs to inform Suppliers of a forthcoming LDSO-led bulk disconnection and allows the LDSO to proceed with the disconnection if the Supplier has not arranged for the de-energisation of the Metering System and recovery of the Meter in that timeframe. Whilst BSCP515 says that the LDSO may liaise with the MOA to arrange for removal and recovery of the Meter in such circumstances, the issue is that it provides no further clarification.

The BSC Auditor found a number of exceptions related to single site disconnections, where LDSOs were disconnecting without a preceding D0134³ for de-energisation.

BSC Auditor conclusions

The BSC Auditor noted that all LDSOs, during audit site visits, explained the need for further clarification to overcome the inherent potential for inefficiencies and confusion in this process that has led to repeated site visits.

³ D0134 'Request to Change Energisation Status'.

Inconsistencies in Half Hourly and Non Half Hourly; and between BSCP514 and BSCP515

Further to the BSC Audit report, we have reviewed BSCP514 and BSCP515. We have identified a number of inconsistencies between the Half-Hourly (HH) and Non-Half Hourly (NHH) processes; and between BSCP514 and BSCP515, that require amendment. The proposed redlining also includes some minor housekeeping changes.

3. CP1384 - Solution

ELEXON raised CP1384 'Clarification on Disconnection and Associated Processes' on 26 October 2012 to address the Audit market issue, introduce clarity and remove the existing BSCP inconsistencies.

CP1384 proposes amendments to BSCP514 and BSCP515:

- To clarify the disconnection and de-energisation processes. This is to reflect that in practice the physical disconnection (the removal of the service cable) would de-energise the Metering System, so there is no need to have the two events separate as long as the LDSO agrees to do so.
- To amend the associated processes for the recovery of the final Meter reading and Metering Equipment, to reflect that the LDSO may do this during a disconnection or to allow sufficient time for the MOA to do so.

The proposed changes set out steps to cover:

- Situations when the LDSO leads, and those where the Supplier leads, on a disconnection; and
- De-energisation and Meter removal where the LDSO leads the disconnection(s).

It also proposes to address:

- The inconsistencies between the HH and NHH processes, and between BSCP514 and BSCP515; and
- The minor errors requiring housekeeping changes.

The proposed CP1384 changes to BSCP514 and BSCP515 are provided in Attachment A.

At the time of drafting the CP, we were aware that the MRA Industry Review Expert Group (IREG) was considering reviewing the disconnection processes, and that it was suggested that these should all be LDSO-led. As it is still not certain what the outcome will be, we believe that it is necessary to address the market issue. However, we recognise that there may be a need for further changes once the review has concluded.

4. CP1384 - Impacts and Costs

Central Impacts and Costs

CP1384 will require updates to BSCP514 and BSCP515, as detailed in Attachment A. There are no required BSC System changes.

Costs associated with ELEXON making the proposed changes equate to £240 (1 man day of effort).

Party Impacts and Costs

Party Impacts	
Party Type	Impacts & Costs
HHMOA	Minor changes to operational processes/training
NHHMOA	
HHDC	
NHHDC	
LDSO	Minor changes to operational processes/training. Should this require system changes, then LDSOs are likely to have significant costs of over £10k per organisation.
Supplier	Minor changes to operational processes/training and negligible costs.

We believe that the system changes indicated by some LDSOs are due to an earlier misunderstanding of the redlined changes. We therefore do not expect there to be any mandatory system changes, and the CP should only require minor changes to operational processes/training for all of the above roles. We believe that any such costs will be negligible, since this CP is only clarifying the current process and not introducing a new mandatory one.

5. CP1384 - Implementation Approach

CP1384 was originally targeted for implementation on 27 June 2013 as part of the June 2013 Release. Some of the responses to the participant impact assessment (IA) have indicated that a longer period is required to implement the CP.

The BSC Auditor undertakes the BSC Audit against the current baseline documentation. Before starting the BSC Audit, it will take into consideration any changes (CPs or Modifications) implemented within a given audit year. It does this to check whether any issues identified before the implementation of these CPs or Modifications are still relevant and whether participants are compliant under the new requirements.

We recommend a revised proposed Implementation Date for CP1384 of 7 November 2013 as part of the November Release. This still allows sufficient time for the Auditor to consider this CP in addressing the market issue as part of the 2013/2014 BSC Audit, as well as taking into account participants' requested implementation lead times.

6. CP1384 - Industry Views

ELEXON issued CP1384 for Participant Impact Assessment via CPC00721.

We received 14 responses, of which one was confidential. Since providing further clarification of the solution, 12 respondents now agree with the CP, but two still disagree. None were neutral.

The following table shows the breakdown of responses. The original full collated participant responses to CP1384 are also available on the BSC Website [here](#) and in Attachment B.⁴

Summary of Responses for CP1384			
Organisation	Capacity in which organisation operates (Supplier, Distributor, LDSO, etc.)	Agree?	Impacted?
Association of Meter Operators	Industry body	Yes	No
British Gas	Supplier	Yes	No
EDF Energy	Supplier, MOA	Yes	Yes
Electricity North West Limited	LDSO	Yes	Yes
GDF SUEZ Marketing Ltd	Supplier	Yes	Yes
IMServ	HHDC, NHHDC, HHDA, NHHDA, HHMOA, NHHMOA	No	Yes
Northern Powergrid	LDSO, UMSO	Yes	Yes
npower	Supplier and Supplier Agents (NHH and HH)	Yes	Yes
ScottishPower	LDSO, Supplier, Supplier Agents	Yes	Yes
SSE	Supplier & Party Agents	Yes	Yes
SSE Power Distribution	LDSO	Yes	Yes
TMA Data Management Ltd	NHHDC, NHHDA, HHDC and HHDA	Yes	No
Western Power	LDSO	No	Yes

⁴ The version published on the BSC Website contains the non-confidential responses, while the version of Attachment B provided to SVG Members also contains the confidential response.



The Association of Meter Operators originally supported the principles of the CP, but felt that the drafting was not sufficiently clear and required further work. ScottishPower also originally did not support the change. Once we addressed their comments, both supported the CP.

Northern Powergrid and SSE Power Distribution originally supported the CP with exceptions; that they both interpreted the CP as introducing the D0142⁵ for a Supplier to request an LDSO to de-energise a Metering System. However, we clarified that this was not the case, addressing their concerns.

Western Power remains opposed to the change. It feels that the CP needs to go out for a second Participant Impact Assessment. This is because it believes that the amendments to the BSCP redlining which we have recommended to address respondents' comments are material due to the number of clarifications. ELEXON does not believe that a second Impact Assessment is necessary as the clarifications are not substantial or material and because we have responded to each comment. There is no requirement in [BSCP40](#) 'Change Management' to conduct a further Impact Assessment based on the number of changes, only on their materiality. Our proposed additional changes to the BSCP redlining are included in parts 2 and 4 of Attachment A.

IMServ was originally in support of the change. However, following further discussions to clarify points raised in its response, it now believes that introducing additional requirements which depend on sending readings in a D0139⁶ is not robust. It has reported that, as an MOA, it would need to manually review and extract information from the D0139 and create a subsequent D0010⁷ for forwarding on. It reports that the quality of the D0139s it has received is poor in terms of the necessary information, with only some LDSOs providing register readings with the Meter serial number defaulted to 'xxx/000' or flows not including a complete set of register readings. As such, it advises that "There is nothing in this proposed change to suggest that quality would improve and therefore we cannot support a process which is destined to fail and result in audit issues for many parties." IMServ believes that the D0010 should be used in all cases to notify a Meter reading.

ELEXON recognises that there may be an issue with the quality of the D0139s provided to the MOA. However, that issue is separate to the issue that this CP is aiming to address, which is clarifying the current processes where the LDSO leads on a disconnection and the associated processes of de-energisation and Meter removal. Although a D0010 may be easier for the MOA to process, it is not certain that mandating the D0010 as a method for an LDSO to notify a Meter reading would not have the same quality issues as the D0139. We also note that the D0139 is already used by LDSOs to notify Meter readings to MOAs. We will consider the quality of D0139 flows separately as part of our assurance function.

⁵ D0142 'Request for Installation or Change to a Metering System Functionality or the Removal of All Meters'.

⁶ D0139 'Confirmation or Rejection of Energisation Status Change'.

⁷ D0010 'Meter Reading'.

Comments on the Proposed Redlining

Attachment B includes all comments and our responses, including our recommendations on any further action. Attachment A includes additional changes to address some of the comments, which in summary are as follows:

BSCP514

- Remove the erroneous 's' from 6.3.2.10 'When'.
- Split out the individual parts of steps 5.3.3.4 and 6.3.3.4 to add clarity.
- Use 'For example, as a result of an emergency' in 5.3.2.14, 6.3.2.9 and footnote 28 instead of the redlined wording.
- Replace footnote 12 with footnote 26, as this includes the LDSO.
- Add the D0221⁸ to 5.3.2.2 and 6.3.2.2, to reflect that this is an available flow for the MOA to inform the Supplier that it cannot attend to carry out change of energisation status.
- Add 'HH' in front of 'MOA' for clarity.
- Add 'NHHMOA' to the 'To' column to reflect the current wording of BSCP515.

BSCP515

- Back out some erroneously proposed timescale changes in 3.6.2.
- Add 'Objections should be limited to the wrong MSID and/or address for disconnection' to the end of footnote 18 to add clarity.
- Add '...where safe to do so' at the end of footnote 17 to reflect that, for safety reasons, it might not be possible for the LDSO to retrieve a final Meter reading and/or recover the Meter in an emergency.
- Remove the erroneously added 'HH' from 3.7.6 and 'For HH Metering Systems' from footnote 20.
- Use 'For example, as a result of an emergency' in 3.6.8, 3.7 and footnote 17 to add clarity.
- As the 'To' field has the MOA and LDSO included, this needs to be clear in the 'Information Required' of 3.6.7 that it is the MOA or LDSO that can contact the HHDC. The proposed redlining was not completely clear, so we recommend that we replace 'the MOA' with 'it' in to read 'The LDSO or MOA (if appropriate) will telephone the HHDC when it is on site...'

⁸ D0221 'Notification of Failure to Install or Energise Metering System'.

7. CP1384 - Recommendations in Isolation of CP1385

Assessment Review

Having considered all of the Impact Assessment responses:

- We do not believe that CP1384 requires mandatory system changes or significant changes to processes, if the SVG accepts our proposed revised amendments to the BSCPs.
- As such, we do not believe that CP1384 will have any significant cost to participants.
- We therefore recommend that the SVG approves CP1384 with the redlining amendments described above.

Recommendations

ELEXON invites the SVG to:

- a) **APPROVE** CP1384 for implementation on 7 November 2013, as part of the November 2013 Release; and
- b) **AGREE** the proposed amendments to BSCP514 and BSCP515, including the revisions identified in this paper and in parts 2 and 4 of Attachment A.

8. CP1385 - Why Change?

Background

The [Distribution Connection Use of System Agreement](#) (DCUSA) section 25.9 allows LDSOs, at any time and with no prior notice to the Supplier or Supplier Agents, to de-energise any Metering Point or Metering System. Within BSCP514 section 6.3, and BSCP515 section 3.6, there are footnotes (56 and 15 respectively) obligating the communication of energisation status changes (and Meter readings if available) between participants.

What is the Issue?

There are no requirements to update industry participants in a timely manner following a de-energisation carried out by the LDSO when not requested by the Supplier. This results in weak controls that cannot be audited. This may result in a mismatch of energisation status between participants, creating exceptions and inaccuracies in Settlement.

Npower raised CP1385 'Notification of NHH Energisation Status Change by LDSO' on 15 October 2012 to address this issue.

9. CP1385 - Solution

CP1385 proposes to obligate participants to communicate energisation status changes (and Meter readings if available) in a timely manner. This will improve Settlement accuracy by improving the controls of this process, thus making it auditable. This will further reduce the risk to Settlement.

CP1385 proposes changes to BSCP514 and BSCP515 as follows:

- Replace the footnote from BSCP514 section 6.3.2.4 regarding LDSO de-energisation with an additional step at the end of sections 6.3.1 and 6.3.2, with timescales of 10 Working Days, to require the NHHMOA to inform the NHHDC and Supplier of change of energisation status and the final Meter register reading, if available;
- Amend the wording in BSCP515 section 3.6.8 regarding when the LDSO can de-energise the Metering System and take a final Meter register reading; and
- Remove a footnote from BSCP515 section 3.6.9.

The proposed changes to BSCP514 and BSCP515 are provided in Attachment C.

10. CP1385 - Impacts and Costs

Central Impacts and Costs

CP1385 will require updates to BSCP514 and BSCP515, as detailed in Attachment C. There are no BSC Systems changes associated with CP1385.

Costs associated with ELEXON making the proposed changes equate to £240 (1 man day of effort).

Party Impacts and Costs

Party Impacts	
Party Type	Impacts & Costs
HHMOA	Minor changes to operational processes/training
NHHMOA	
HHDC	
NHHDC	
LDSO	Minor changes to operational processes/training. Should this require system changes, then LDSOs are likely to have significant costs of over £10k per organisation.
Supplier	Minor changes to operational processes/training and negligible costs.

The responses are therefore similar to those for CP1384. As with that CP, we believe that the system changes indicated by some LDSOs are due to an earlier misunderstanding of the redlined changes. We do not expect there to be any mandatory system changes, and CP1385 should only require minor changes to operational processes/training for all of the above roles with negligible costs.

11. CP1385 - Implementation Approach

CP1385 is targeted for implementation on 27 June 2013 as part of the June 2013 Release.

Some of the responses to the Participant Impact Assessment have indicated that a longer period is required to implement the CP.

The Proposer of CP1385 seeks implementation as soon as practicable to address the issues and the risk it perceives to Settlement. As such, it seeks implementation in the next available Release, which is on 27 June 2013 as part of the June Release.

However, as mentioned in sections 1 and 5, above, both CPs 1384 and 1385 impact the same BSCPs (and in some cases the same sections of these BSCPs). As such, implementation in the same Release should allow for easier and more efficient implementation by participants. As we are recommending that the Implementation Date for CP1384 is revised from June to November 2013 for the reasons set out in section 5, we recommend an identical revised November 2013 date for CP1385. The Proposer of CP1385 prefers the June 2013 Release, but is open to the later Implementation Date of November 2013.

We therefore recommend a revised proposed Implementation Date for CP1385 of 7 November 2013 as part of the November 2013 Release.

12. CP1385 - Industry Views

ELEXON issued CP1385 for Participant Impact Assessment via CPC00721.

We received 13 responses, of which ten agreed with the CP, three disagreed and none were neutral. As with CP1384, we received one confidential response.

The following table shows the breakdown of responses. The full collated participant responses to CP1385 are available on the BSC Website [here](#) and in Attachment B.⁹

Summary of Responses for CP1385			
Organisation	Capacity in which organisation operates (Supplier, Distributor, LDSO, etc.)	Agree?	Impacted?
Association of Meter Operators	Trade Association	Y	N
British Gas	Supplier	Y	N
EDF Energy	Supplier, MOA	Y	Y
Electricity North West Limited	LDSO	Y	Y
GDF SUEZ Marketing Ltd	Supplier	Y	Y
IMServ	HHDC, NHHDC, HHDA, NHHDA, HHMOP, NHHMOP	N	Y
Northern Powergrid	LDSO, UMSO	Y	Y
npower	Supplier and Supplier Agents (NHH and HH)	Y	N
ScottishPower	LDSO, Supplier, Supplier Agents	Y	Y
SSE	Supplier & Supplier Agents	Y	Y
SSE Power Distribution	LDSO	N	Y

⁹ The version published on the BSC Website contains the non-confidential responses, while the version of Attachment B provided to SVG Members also contains the confidential response.

Summary of Responses for CP1385

Organisation	Capacity in which organisation operates (Supplier, Distributor, LDSO, etc.)	Agree?	Impacted?
TMA Data Management Ltd	NHHDC, NHHDA, HHDC and HHDA	Y	N
Western Power Distribution	LDSO	N	Y

IMServ agrees that there is a current issue where the LDSO changes energisation status or removes the Meter, and does not object to the proposed timescales. However, as with CP1384, it feels that the introduction of any additional requirements which depend on sending readings in a D0139 flow is not robust. Please see [its response to CP1384 for more detail](#).

Western Power Distribution has confirmed that it understands it is not the intention to add the D0010 as a dataflow for notifying the Meter reading from the LDSO to the NHHMOA, as this would have required LDSOs to make system changes with associated costs. However, it does not consider there to be a material problem with current processes and believes that the Proposer has not identified the problem or costs of the problem. As such, it does not support this change.

After being provided with clarification, including the removal of the erroneous reference to the D0010 as the method for the LDSO to notify the Meter reading to the NHHMOA, ScottishPower advised that it now supports the CP. This is subject to the SVG agreeing the clarifications to the BSCP redlining.

As noted above for CP1384, ELEXON recognises that there may be an issue with the quality of the D0139s provided to MOAs but notes that this is separate to the issue being addressed by this CP and that ELEXON will consider the quality of D0139 flows separately as part of its assurance function.

We have included our additional proposed redlined changes in Parts 2 and 4 of Attachment C.

Comments on the Proposed Redlining

Attachment B includes all comments and our responses, including our recommendations on any further action. Attachment C includes additional changes to address some of the comments, which in summary are as follows:

BSCP514

- Add header 'If LDSO energises' before 6.3.1.7 and 6.3.2.7 for clarity.
- Amend 6.3.1.7 and 6.3.2.7 to reflect 6.3.1.4, as appropriate, to reflect process and add clarity.
- Amend '...final Meter register reading...' to '...initial Meter register reading...' in the 'Action Required' to reflect that this is an energisation not a de-energisation.

BSCP515

- Amend timescale from 5 Working Days to 10 Working Days in 3.6.9 and 3.6.11, to address comments that this is not aligned with BSCP514 section 6.3.2.7.
- Use 'For example, as a result of an emergency' in new footnote 1.
- Align 3.6.11 with 3.6.9, to reflect process and add clarity – this includes the removal of the D0010 and addition of information required for Prepayment Meters.

13. CP1385 – Recommendations in Isolation of CP1384**Assessment Review**

After considering all of the Impact Assessment responses,

- We do not believe that CP1385 requires mandatory system changes or significant changes to processes, if the SVG accepts our proposed revised amendments to the BSCPs.
- As such, we do not believe that CP1385 will have any significant cost to participants.
- We therefore recommend that the SVG approves CP1385 with the redlining amendments described above.

Recommendations

ELEXON invites the SVG to:

- a) **APPROVE** CP1385 for implementation on 7 November 2013, as part of the November 2013 Release; and
- b) **AGREE** the proposed amendments to BSCP514 and BSCP515, including the revisions identified in this paper and in parts 2 and 4 of Attachment C.

14. CP1384 and CP1385 - Recommendations if Both CPs Approved

Assessment Review

Both CPs impact the same BSCPs, and in some cases the same sections of these BSCPs. Therefore we have provided Attachments D and E to show how the two changes could be implemented together. It has also been necessary for ELEXON (CP1384 Proposer) and npower (CP1385 Proposer) to agree the wording where there is any overlap.

This includes:

- Use of “for example, as the result of an emergency” where the redlined changes to BSCP514 and BSCP515, for both CP1384 and CP1385, reference LDSO emergency activities; and
- Amending the new timescale in CP1384’s redlining to BSCP514 section 6.3.2.11 to 10WDs, to reflect that of CP1385’s redlining to BSCP514 section 6.3.2.7.

Due to the similar impacts of both CPs on participants, implementation in the same Release should allow for easier and more efficient implementation. So taking into account the implementation timescales indicated by respondents and that both CPs impact the same BSCPs, the SVG needs to decide whether either CP should be implemented in a later Release and whether they should be implemented in the same Release, if both are approved. Although both have related impacts and there are benefits to implementing at the same time, the two CPs are not dependent on each other so could be implemented in different Releases.

If the SVG approves both CPs but for different Releases, then we recommend the implementation of the redlining as follows:

If CP1384 is to be implemented before CP1385

Approve redlining in Attachment A for the first Release, then redlining in Attachments D & E for the second Release.

If CP1385 is to be implemented before CP1384

Approve redlining in Attachment C for the first Release, then redlining in Attachments D & E for the second Release.

Recommendations

ELEXON invites the SVG to:

- a) **APPROVE** CP1384 and CP1385 for implementation on 7 November 2013, as part of the November 2013 Release; and

- b) **AGREE** the proposed amendments to BSCP514 and BSCP515 as contained in Attachments D and E (noting that these include the further changes described in this paper to address respondents' comments as well as overlaps between the CP solutions).

Attachments:

Attachment A – CP1384 BSCP514 & BSCP515 Redlining v0.1 and Showing Additional Redlining

Attachment B – CP1384 & CP1385 Comments on the Proposed Redlining¹⁰

Attachment C – CP1385 BSCP514 & BSCP515 Redlining v0.1 and Showing Additional Redlining

Attachment D – Merged CP1384 & CP1385 BSCP514 Redlining including the additional redlining

Attachment E – Merged CP1384 & CP1385 BSCP515 Redlining including the additional redlining

For more information, please

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¹⁰ The version of this Attachment provided to the SVG includes confidential comments. The version published on the BSC Website represents the non-confidential responses.