130/007

INITIAL WRITTEN ASSESSMENT for Modification Proposal P216 'Audit of LLF Production'

Prepared by: ELEXON Limited[1]

Date of Issue:	03 August 2007	**Document Reference:**	P216IR
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This document has been distributed in accordance with Section F2.1.10 of the Balancing and Settlement Code.[2]

P216 seeks to provide additional assurance to the industry and the BSC Panel that the Line Loss Factors (LLFs) they are approving are accurate and consistent with the methodology published. P216 proposes that this assurance is achieved through the auditing of these methodologies and the use of spot checks on the allocation of the correct Line Loss Factor Classes (LLFCs) to Metering Systems. P216 further seeks to ensure that Line Loss Factors are not changed part way through a year.

BSCCO'S RECOMMENDATIONS

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

- **DETERMINE that Modification Proposal P216 should be submitted to the Definition Procedure;**
- **AGREE the Definition Procedure timetable such that a Definition Report should be completed and submitted to the Panel for consideration at its meeting of 11 October 2007;**
- **DETERMINE that the P216 Modification Group be formed from members of the Volume Allocation, Governance and Settlement Standing Modification Groups with the addition of Distribution Company Representative(s); 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 P216.

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

Parties		Party Agents		BSC Agents		Other Agents	
Distribution System Operators	☒	Data Aggregators	☐	SAA	☐	Supplier Meter Registration Agent	☒
Generators	☒	Data Collectors	☐	FAA	☐	Unmetered Supplies Operator	☐
Interconnectors	☐	Meter Administrators	☐	BMRA	☐	Data Transfer Service Provider	☐
Licence Exemptable Generators	☒	Meter Operator Agents	☐	ECVAA	☐		
Non-Physical Traders	☐	ECVNA	☐	CDCA	☐		
Suppliers	☒	MVRNA	☐	TAA	☒		
Transmission Company	☐			CRA	☐		
				SVAA	☐		
				Teleswitch Agent	☐		
				BSC Auditor	☒		
				Profile Administrator	☐		
				Certification Agent	☐		

Sections of the BSC	
A	☐
B	☒
C	☐
D	☐
E	☒
F	☐
G	☐
H	☐
I	☐
J	☐
K	☒
L	☐
M	☐
N	☐
O	☐
P	☐
Q	☐
R	☐
S	☐
T	☐
U	☐
V	☐
W	☐
X	☐

Code Subsidiary Documents		Core Industry Documents		BSCCo		BSC Panel/Panel Committees		Other	
BSC Procedures	☒	Ancillary Services Agreement	☐	Internal Working Procedures	☒	Working Practices	☒	Market Index Data Provider	☐
Codes of Practice	☐	British Grid Systems Agreement	☐					Market Index Definition Statement	☐
BSC Service Descriptions	☐	Data Transfer Services Agreement	☐					System Operator-Transmission Owner Code	☐
Party Service Lines	☐	Distribution Code	☒					Transmission Licence	☐
Data Catalogues	☐	Distribution Connection and Use of System Agreement	☒						
Communication Requirements Documents	☐	Grid Code	☐						
Reporting Catalogue	☐	Master Registration Agreement	☐						
		Supplemental Agreements	☐						
		Use of Interconnector Agreement	☐						

1 DESCRIPTION OF PROPOSED MODIFICATION

1.1 Background

1.1.1 Line Loss Factors

Line Loss Factors (LLFs) represent the losses on the distribution network for a particular MSID (Metering System Identifier) between the metering point and the connection to the boundary of the Transmission System. LLFs are required, by Distribution Licences, to represent an accurate reflection of the actual losses on the line. The methodologies used in calculating Line Losses used are published by LDSOs.

1.1.2 Line Loss Factors in the Balancing and Settlement Code (BSC)

Settlement is based on the use of electricity volumes at Transmission System Boundary Points and Grid Supply Points (GSPs); LLFs are used within settlement to scale a metered volume (measured within a Distribution Network) to provide an equivalent volume at the relevant GSP or Transmission System Boundary Point, the scaled volume is then used in settlement.

Currently the Imbalance Settlement Group (ISG) and Supplier Volume Allocation Group (SVG) approve LLFs (having delegated authority from the Panel) for use in settlement for CVA and SVA respectively. Prior to the approval of LLFs, some basic checks are undertaken to ensure completeness and for comparison with previously submitted LLFs.

1.1.2.1 Central Volume Allocation (CVA) Line Loss Factors

There are a relatively small number of CVA LLFs (due to the small number of CVA MSIDs connected to the Distribution System), with LLFs for approximately 100 MSIDs being approved as part of the annual review last year. CVA LLFs are checked to ensure that:

- the factors are complete; and
- where the change from a previous factor for a similar time period is more than double, or less than half the previous value; then the BSCCo will confirm the value submitted with the LDSO[3] before approval is requested.

ELEXON will also report, when the LLF is taken for approval, if the Registrant has highlighted an objection to a particular LLF; however, the agreement of LLFs (between the LDSO and the Registrant) is not carried out under the BSC and the BSC does not currently require the LLF to have been agreed with the Registrant.

The processing and validation of CVA LLFs is described within BSCP28 ('Approval and Notification of CVA LLFs').

1.1.2.2 Supplier Volume Allocation (SVA) Line Loss Factors

There are a much greater number of SVA LLFs (due to the larger number of SVA Metering Systems); as such these are sent to ELEXON via the D0265 data flow ('Line Loss Factor Data File'). As part of the annual reload process, files are received by ELEXON (from LDSOs) and validated. Further files are received throughout the year, as and when LLFs need to be updated.

BSCP528 ('SVA LLFs for HH and NHH SVA Metering Systems registered in SMRS') describes the processes for validating and approving SVA LLFs. As set out in BSCP528, ELEXON performs a number of validation checks on the LLFCs and associated LLFs to:

- check for completeness (using an MDD comparison) to ensure there are LLFs for all LLFCs;

[3] A change from a factor of 1.01 to 1.02 equates to a doubling of the loss and a change from 1.08 to 1.04 equates to a halving of the loss.

- check the percentage change from the previous years submission (for updated LLFs only); and
- check the range of values (which currently must be between 1.0 and 1.25).

The Summary and Validation Reports resulting from this validation are provided to the SVG with the LLFs for approval.

It is noted that ELEXON are currently looking at ways to automate the validation of the D0265 files by using a LuSTRe[4] based solution, to speed up the validation process and to allow a greater sample to be analysed when checking the change in LLF values from one year to the next.

1.1.2.3 Current LLF Assurance

If new a LLF is not approved prior to the old LLF expiring, then a default value (of 1.0) is used. There is a PARMS Serial (DA02 'Timely Application of LLFs') which records when the Half Hourly (HH) SVA LLFs are default LLFs.

The BSC Audit scope currently covers the application of LLFCs by SVAA and the notification of LLFs to BSCCo by LDSOs.

New CVA and SVA LLFCs and associated LLFs (and replacement LLFs for existing LLFCs) can be submitted and approved during the course of the year; these are taken to the SVG and ISG as appropriate.

1.1.2.4 Previous Consideration of LLF Approval

Concerns have previously been raised at the SVG, and by ISG to the Panel on the approval of LLFs for use in settlement. Concerns were expressed regarding the perceived 'rubber stamping' of submitted LLFCs (and their associated LLFs) and whether the ISG/SVG had the relevant experience to approve the exact figures for LLFs.

A meeting was held in May 2004 with an ISG member, Licensed Distribution System Operators (LDSOs) and ELEXON to discuss the authorisation processes for CVA LLFs. This resulted in a review of the LLF approval process in 2004.

A paper was presented to the April 2005 Panel (91/012) which explained the current BSC obligations for submitting LLFs for approval. The Panel noted that an Ofgem review of the existing processes would be taking place, and that the Panel paper would be submitted to Ofgem for consideration as part of the review.

It is believed that one outcome of this review was the agreement that LDSOs would publish their current LLF methodologies as part of their Use of System Charging methodology statements from April 2006, with a note that their LLF calculation methodology is not subject to Authority approval. A review by ELEXON of these statements for April 2007 shows that this is the case.

1.2 Modification Proposal

P216 was raised on 30 July 2007 by Smartest Energy ('the Proposer'). P216 seeks to provide additional assurance and controls over the calculation and application of LLFs in both the SVA and CVA market.

The Proposer noted that the ISG and SVG currently have no mechanism to check that LLFs are correct and accurate before they are approved, although some high level checks (as described in section 1.1.2) are applied. With CP1189[5] ('Change to allow SVA Line Loss Factors less than one') due to be implemented in November 2007, the Proposer raises concerns that these high level checks will become less useful.

Furthermore, the Proposer notes that distribution losses represent approximately 7% of the total energy, and hence incorrect LLFs have the potential to create significant inaccuracy in settlement and could be adversely impacting GSP Group Correction Factor.

[4] A definition of LuSTRe is included in the Terms and Definition section of this paper (section 4).

[5] CP1189 allows for LLFs to be set less than one, primarily for use with embedded generation in a low demand area.

P216 suggests that additional assurance should be provided regarding the accuracy and correct application of LLFs by:

a) removing the option to change existing LLFs mid year;

b) determining rules, which LLF methodologies must follow;

c) requiring the submission of the methodology used to calculate an LLF when a new/revised LLF is submitted;

d) auditing the LLFs submitted for approval to confirm that they have methodologies consistent with these rules (determined as per (b));

e) auditing the calculation of the LLFs submitted to confirm that it is consistent with the methodology submitted; and

f) following the approval of LLFs by ISG/SVG, conducting spot checks to ensure that the correct LLFC is being assigned at Metering System level.

The modification indicates that, where an LLF fails to comply with one of the above audits, the LLF should not be approved and that only approved LLFCs (and their associated LLFs) should be used within settlement.

P216 suggests that a Modification Group should further consider:

- who should conduct the audits described above, with either ELEXON, the Technical Assurance Agent (TAA) or a new BSC Agent suggested;
- the process for rejecting LLFs and any associated default rules;
- the rules which LLF calculation methodologies must follow; and
- to what extent inaccurate LLFs might impact GSP Group Correction Factor.

ELEXON notes that the scope and aim of the audits described above will also require further definition to clarify the approach that will be undertaken and to aid the assessment of P216.

2 AREAS FOR CONSIDERATION IN PROGRESSING MODIFICATION PROPOSAL

2.1 Areas that Require Additional Definition

An initial assessment of P216 has identified the following areas which BSCCo recommends should be defined further during the progression of the Modification Proposal:

- the scope and aims of the audits suggested;
- how inaccurate LLFs might impact on GSP Group Correction Factor, how significant any impact is for settlement and the appropriateness of assessing this issue under P216;
- whether the rules for LLF methodologies should be Code defined (and constructed by the Modification Group as part of the Modification) or approved and amended from time to time by, for example, a Panel Committee; and
- confirm that the audits proposed are within the scope of the BSC, as opposed to any other governance arrangements.

2.2 Areas Requiring Further Consideration

When those areas set out in 2.1 have been more clearly defined, the Modification Group will need to consider:

- who (e.g. an existing or new BSC Agent/service provider or ELEXON) should conduct each of the audits and checks described in P216 and to whom reports should be provided to;
- the detailed scope, approach and timing for each of the checks described in P216 and how these could be changed in the future;
- the procedure to be followed if an LLF fails one or more of these audits, including any default rules;
- (depending on how the rules for methodologies are defined), either the rules on methodologies to be included in the BSC, or consider the process and responsibilities for constructing and updating the rules;
- any changes needed to the process for new LLFs being approved during the course of the year;
- the differences between SVA and CVA LLFs and whether this leads to any differences in audit approach;
- any interaction with approved Modifcations, such as P197 ('SVA Qualification Processes Review') and P207 ('Introduction of a new governance regime to allow a risk based Performance Assurance Framework (PAF) to be utilised and reinforce the effectiveness of the current PAF');
- whether the risk to settlement justifies the impact/cost of providing each of the suggested audits; and
- any futher impacts or processes considered necessary following the futher definition of the areas noted in section 2.1.

3 RATIONALE FOR BSCCO'S RECOMMENDATIONS TO THE PANEL

BSCCo believes that further definition of the areas raised in section 2.1 of this IWA is required before the Modification Proposal can be fully assessed. BSCCo therefore recommends that P216 proceed to the Definition Procedure.

BSCCo recommends that P216 be submitted to a 2-month Definition Procedure.

It is estimated that progression of P216 will require:

- 3 Modification Group meetings; and
- 1 industry consultation.

The proposed timetable and estimated costs for the progression of P216 through the Definition Procedure are shown in Appendix 3.

BSCCo recommends that the P216 Modification Group be formed from members of the Volume Allocation, Governance and Settlement Standing Modification Groups, whose areas of expertise include Supplier Volume Allocation, Central Volume Allocation, Performance Assurance and BSC Agents. Additionally Distribution Company Representatives should be invited.

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
CVA	Central Volume Allocation
GSP	Grid Supply Point
ISG	Imbalance Settlement Group
LDSO	Licensed Distribution System Operator
LLF	Line Loss Factor
LLFC	Line Loss Factor Class
LuSTRe	LuSTRe is an application which provides a control framework that other applications can be run under. It supports file loading, reports, and scripts to control the processing. It can also automatically locate and load files from directories on the LuSTRe or other servers. LuSTRe is a client server application. The Server side part of LuSTRe runs as a service, and will be active all the time that the server is running. The Client (user interface) side of LuSTRe runs on a standard Windows XP system and revolves around configuring the processing and checking its status.
SVA	Supplier Volume Allocation
SVG	Supplier Volume Allocation Group
TAA	Technical Assurance Agent

5 DOCUMENT CONTROL

5.1 Authorities

Version	Date	Author	Reviewer	Reason for Review
0.1	31/07/07	Ysanne Hills	-	For peer review
0.2	01/08/07	Ysanne Hills	David Jones	For technical review
0.3	02/08/07	Ysanne Hills	Chris Rowell	For quality review
1.0	03/08/07	Change Delivery	-	For Panel decision

APPENDIX 1: MODIFICATION PROPOSAL

Modification Proposal – BSCP40/03	MP No: P216 *(mandatory by BSCCo)*

Title of Modification Proposal *(mandatory by originator)*:

Audit of LLF Production

Submission Date *(mandatory by originator)*:

30th July 2007.

Description of Proposed Modification *(mandatory by originator)*

Line Loss Factors (LLFs) are currently produced by Distribution Network Operators (DNOs) according to various different models. The methodologies are described in general terms in the DNOs' Use of System Statement of Charges documentation. Resulting LLFs are *approved* by SVG (for SVA) and ISG (for CVA). The Code does not specifically require that these LLFs are *checked* by SVG and ISG to confirm that they are consistent with the methodology, nor that the correct Line Loss Factor Class (LLFC) has been applied to each MPAN, nor that the methodologies are in any way consistent with each other or in any way adequate.

It is proposed with this modification that ELEXON audits the DNOs' production of LLFs so that SVG and ISG can approve them with some confidence as to their accuracy to the methodology. It is also proposed that ELEXON conducts spot checks that the correct LLFCs have been applied to the correct MPAN.

As part of this modification it is also proposed that the Code should state that, should a DNO not make their methodologies and production arrangements available, that their LLFs should not be approved, nor should new LLFs associated with new LLFCs be accepted until such time as they have been audited. In this event, only currently approved LLFs and LLFCs may be used in Settlement.

It is further proposed that the Code should state that LLFs may not be changed mid-year.

SmartestEnergy believes that, if the DNOs' methodologies and production arrangements are not consistent or adequate, that any new LLFs produced are rejected until they are of a standard consistent with rules to be determined after ELEXON have assessed the different methodologies. This process should be given greater consideration in the modification process.

There is no doubt that understanding the DNOs' methodologies is a specialised area and ELEXON may opt to sub-contract responsibility for this to an Agent in the same way that there is a Technical Assurance Agent (TAA). Indeed, it may be appropriate for the audit to come under the remit of the TAA. This is also for discussion within the Group.

Description of Issue or Defect that Modification Proposal Seeks to Address *(mandatory by originator)*

SVG and ISG currently have no means of checking the accuracy of the LLFs being submitted for their approval and yet LLFs have a significant impact on Settlement; it is thought that distribution losses represent about 7% of total energy.

On the other hand, there are sufficient audits and controls around other areas which can significantly affect Settlement such as the Balancing Mechanism, Metering etc.

CP1189 is due to be implemented in the November 2007 release. This means that negative LLFs may enter Settlement without any checks as to their accuracy or appropriateness from then on.

The current process as described in BSCP 528 and BSCP 28 allows for some basic checking of values before

Modification Proposal – BSCP40/03	MP No: P216 *(mandatory by BSCCo)*

they are presented for approval:

- Check for completeness
- Spot check of percentage change
- Ensure within 0% and 25%

By and large SVG and ISG have previously given LLFs a reasonableness check against values previously submitted. This is insufficient in itself and will now be difficult to do anyway with the introduction of negative LLFs as per CP1189.

It is understood that ELEXON are currently looking at a more automated and robust way of analysing changes to LLFs but this does not address the issue of whether the LLFs are appropriate in the first place.

In short the defect is that there are insufficient controls around factors which have a significant impact on the output of Settlement.

It is also fair to say that the industry (and ELEXON) currently have very little idea of how much of the GSP Group Correction Factor is due to approximations (and/or inaccuracies) in LLFs. There have been many Modification and Issue Group discussions in the past which have highlighted this lack of understanding as an issue. It is expected that the information which will come out of an investigation of the methodologies will lead to an increased understanding of this issue.

Impact on Code *(optional by originator)*

Impact on Core Industry Documents or System Operator-Transmission Owner Code *(optional by originator)*

Impact on BSC Systems and Other Relevant Systems and Processes Used by Parties (*optional by originator)*

Impact on other Configurable Items (*optional by originator)*

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

The Panel already has the remit to "approve" LLFs and it delegates this responsibility to its Committees. SmartestEnergy believes that the BSC has an implied duty to check that the values are correct. This needs to be stated explicitly in the Code.

As previously stated losses represent a significant proportion of energy entering Settlement and yet are not audited. An audit process would improve the efficiency of the BSC arrangements.

We note that the calculation of Transmission Loss Factors (TLFs) and Transmission Loss Multipliers (TLMs) is within the scope of the BSC and not the CUSC. It is appropriate, therefore, that the calculation of LLFs should be within the scope of the BSC and not, say, the DCUSA. The reason for this is that it is in the BSC that the financial effects of losses of both types are felt by Parties.

Modification Proposal – BSCP40/03	MP No: P216 *(mandatory by BSCCo)*
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: ***Name……Colin Prestwich*** ***Organisation…SmartestEnergy*** ***Telephone Number…020 7448 0961*** ***Email Address…Colin-Prestwich@smartestenergy.com***	
Details of Proposer's Representative: ***Name……Colin Prestwich*** ***Organisation…SmartestEnergy*** ***Telephone Number…020 7448 0961*** ***Email Address…Colin-Prestwich@smartestenergy.com***	
Details of Representative's Alternate: ***Name…Robert Owens*** ***Organisation…SmartestEnergy*** ***Telephone Number…020 7448 0916*** ***Email Address…Robert-Owens@smartestenergy.com***	
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 P216.

a) Impact on BSC Systems and Processes

No significant impact anticipated. LLF values could change more frequently, but processing (e.g. by SVAA) will remain the same.

b) Impact on BSC Agent Contractual Arrangements

BSC Agent Contract	Potential Impact of Proposed Modification
C&C Group (TAA)	Potential impact if the TAA carries out one or more of the audits proposed by P216.
PwC (BSC Auditor)	Potential impact if the BSC Auditor carries out one or more of the audits proposed by P216.
New BSC Agent	Potential for a new BSC Agent to be required, if it is decided that a new BSC Agent should carry out one or more of the audits proposed by P216.

c) Impact on BSC Parties and Party Agents

It is expected that P216 would impact LDSOs, Generators and Suppliers.

LDSOs would be subject to additional checks regarding the accuracy and methodology used to calculate LLFs. LLFs might need to be submitted earlier to allow for the audit processes, and there would be additional restrictions as to when updated LLFs can be approved and used.

Suppliers and Generators may find that as a result of new rules applied to methodologies for calculating LLFs, LLFs are updated.

No impact is anticipated for Supplier Agents.

d) Impact on Transmission Company

No impact anticipated.

e) Impact on BSCCo

Area of Business	Potential Impact of Proposed Modification
CVA and SVA Operations	It is likely that the ELEXON processes for facilitating the approval of LLFs by the Panel (as delegated to SVG and ISG) would need to be updated to take into account the additional audit requirements proposed. If one or more of the SVA LLF audits proposed were to be included within the current validation system, then this would require the ELEXON operational processes and the validation system to be updated.
Performance Assurance	If the LLF audits were to fall into the Performance Assurance Framework (and be carried out by either ELEXON or a BSC Agent/service provider) then additional procedures would be needed to manage the process/service provider.
Implementation	ELEXON would need to implement the proposed changes. This process is likely to include CSD drafting, process walkthroughs, education, and could include the procurement of a new BSC Agent or service provider.

f) Impact on Code

Code Section	Potential Impact of Proposed Modification
B (Panel and Panel Committees)	Possible impact if additional requirements were to be placed on the Panel (or Panel Committees). Relatively unlikely to be impacted.
E (BSC Agents)	If a new BSC Agent is to perform one or more of the audits proposed in P216, then this section will need to be updated.
K (Metering Systems)	Changes are likely to be needed, particularly for section K 1.7 which relates to LLFs and LLF approval.

g) Impact on Code Subsidiary Documents

Document	Potential Impact of Proposed Modification
BSCP28 (Approval and Notification of CVA LLFs)	Changes would be needed to the approval process for CVA LLFs currently set out in BSCP28.
BSCP528 (SVA LLFs for HH and NHH SVA Metering Systems registered in SMRS)	Changes would be needed to the approval process for SVA LLFs currently set out in BSCP528.

h) Impact on Core Industry Documents and Other Documents

Document	Potential Impact of Proposed Modification
Distribution Connection and Use of System Agreement	Potential impact. This will need to be further considered as P216 is progressed.
Grid Code	Potential impact. This will need to be further considered as P216 is progressed.

i) Impact on Other Configurable Items

Document	Potential Impact of Proposed Modification
CVA TAA Service Description	Possible impact, if the Modification Group decide that the TAA should carry out one or more of the audits proposed.
SVA TAA Service Description	Possible impact, if the Modification Group decide that the TAA should carry out one or more of the audits proposed.

j) Impact on BSCCo Memorandum and Articles of Association

No impact anticipated.

k) Impact on Governance and Regulatory Framework

No impact anticipated.

APPENDIX 3: COSTS AND TIMETABLE FOR PROGRESSION

ESTIMATED COSTS OF PROGRESSING MODIFICATION PROPOSAL[6]

Please note: these costs are for the Definition Procedure only. The extent of the Assessment Procedure required will be dependent on the conclusions within the Definition Report. An estimation of the costs required to progress P216 through Assessment will be provided at the conclusion of the Definition Phase.

Meeting Cost	£ 1,500
Legal/Expert Cost	£ N/A
Impact Assessment Cost	£ N/A
ELEXON Resource	38 man days £ 15,000

[6] 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

Timetable for Progression

ID	Task Name	Duration	Start	Finish
1	Prepare for MG meeting 1	6 days	Fri 10/08/07	Fri 17/08/07
2	Modification Group (MG) Meeting 1	0 days	Tue 21/08/07	Tue 21/08/07
3	Draft Consultation Document	6 days	Wed 22/08/07	Wed 29/08/07
4	MG Review Consultation	2 days	Thu 30/08/07	Fri 31/08/07
5	MG meeting 2	0 days	Mon 03/09/07	Mon 03/09/07
6	Update Consultation Document	3 days	Tue 04/09/07	Thu 06/09/07
7	Industry Consultation	5 days	Fri 07/09/07	Thu 13/09/07
8	Consultation Responses Collated	1 day	Fri 14/09/07	Fri 14/09/07
9	MG consider Consulation Responses	2 days	Mon 17/09/07	Tue 18/09/07
10	MG meeting 3	0 days	Tue 18/09/07	Tue 18/09/07
11	Draft Definition Report	4 days	Thu 20/09/07	Tue 25/09/07
12	MG Review Definition Report	3 days	Wed 26/09/07	Fri 28/09/07
13	Updated Definition Report	1 day	Mon 01/10/07	Mon 01/10/07
14	Panel Paper Published	0 days	Fri 05/10/07	Fri 05/10/07
15	Panel Meeting	0 days	Thu 11/10/07	Thu 11/10/07