

CP1458 v2.0 'Introduction of timescales for the P283 Commissioning process for SVA CT operated Metering Systems'



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About This Document

This document is the Final Change Proposal (CP) Report for CP1458 (v2.0), which ELEXON has published following the final decision from the Supplier Volume Allocation Group (SVG) to approve CP1458 (v2.0).

There are six parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, and proposed implementation approach. It also summarises the SVG's views on the changes and the views of respondents to the CP Consultation along with the final decision on whether to approve the change.
- Attachment A contains the CP1458 v2.0 proposal form.
- Attachment B contains a diagram detailing the timescales for CP1458.
- Attachments C and D contain the approved changes to deliver the CP1458 solution.
- Attachment E contains the full responses received to the CP Consultation.

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1 Why Change?

Approved Modification P283

[Approved Modification P283 'Reinforcing the Commissioning of Metering Equipment Processes'](#) was implemented on 6 November 2014. The Modification placed Commissioning obligations on the Metering Equipment owner. This shifted responsibility for Commissioning of Measurement Transformers from the Meter Operator Agent (MOA) to the Licensed Distribution System Operator (LDSO) (including Embedded Distribution Systems Operators, or Transmission Company where applicable).

It also placed an obligation on the MOA to communicate the Commissioning status of a Metering System to the Registrant of that Metering System (typically the Supplier). This was intended to ensure that the Supplier had a complete picture of the status of its Half Hourly (HH) portfolio. The Supplier could then take corrective action where there was a gap in the Commissioning process.

Under P283, MOAs retained responsibility for assessing the overall accuracy of the Metering System. TAPAP checks for P283 processes during the period of January – March 2015, ELEXON performed a [Technical Assurance of Performance Assurance Parties \(TAPAP\)](#) check on the P283 process and its implementation. This check was completed for new Metering Systems installed for HH Measurement Class 'C' (Mandatory 100kW or above HH metered) on or after 6 November 2014. This was carried out across LDSOs, HHMOAs and Suppliers. Performing the check soon after implementation meant that we could identify breakdowns in the process early and take action to resolve these. ELEXON presented the findings to the Performance Assurance Board (PAB) at its meeting on 23 April 2015 ([PAB171/05](#)).

ELEXON set up a Workgroup following this TAPAP check to look at the timescales for Commissioning. The group included members of the original Code of Practice (CoP) 4 guidance group, which was created during the implementation of P283 in November 2014. This first meeting of the Workgroup took place in August 2015 where initial timescales were proposed.

Because the 2014/15 P283 TAPAP check did not reveal enough to show if the P283 process had been fully adopted, the PAB requested that ELEXON perform another check under the same scope. The second check was performed during September – November 2015. ELEXON presented the results of the second check to the PAB at its meeting on 17 December 2015 ([PAB179/06](#)).

The findings from both TAPAP checks can be found on the [Technical Assurance of Performance Assurance Parties](#) page of our website. Both checks highlighted a need for timescales throughout the end-to-end P283 Commissioning process.

A second Workgroup meeting took place in January 2016 (following the findings report presented to PAB179 in December). This meeting also included representatives from some of the Parties and Party Agents involved in the checks. This was to ensure that the timescales were still fit for purpose following the second set of findings.



What is Commissioning?

Commissioning is a series of tests and checks, used to demonstrate that Metering Equipment complies with the relevant Code of Practice and is therefore working properly. Any failures identified during the Commissioning process must be addressed before the Metering System becomes effective in Settlement.



What is the Technical Assurance of Performance Assurance Parties?

Technical Assurance of Performance Assurance Parties (TAPAP) is a detective technique in ELEXON's Performance Assurance Framework (PAF). The aim of TAPAP is to determine where Parties are meeting their BSC obligations and to identify weakness in the BSC processes (and other processes as appropriate). TAPAP checks are targeted at key market performance and risk areas on an annual basis, usually highlighted through the BSC Audit.

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What is the issue?

[Balancing and Settlement Code \(BSC\) Section L2.3.2](#) states that the Registrant must make 'all reasonable endeavours' to commission before Energisation. However, it does not specify in what timescales Commissioning and its related activities should be completed. Current practices mean that the amount of time taken to commission Metering Equipment and respond to communications is at the discretion of the Party or Party Agent. This communication includes, but is not restricted to, measurement transformer Calibration Certificates; Commissioning records for each piece of Metering Equipment; and notifications to the Supplier of the Commissioning status of the Metering System.

ELEXON and members of the timescales Workgroup agreed a set of timescales and this Change Proposal (CP) was raised to incorporate these into the current processes.

Proposed solution

[CP1458 'Introduction of timescales for the P283 Commissioning process for SVA CT operated Metering Systems'](#) was raised by ELEXON on 16 February 2016. Following the initial round of consultation responses, along with further internal discussions, a material change was made to the solution. This required the re-consultation of the solution. The material change related to the removal of the Non-Half Hourly (NHH) redlining to better align the CP solution to the intentions of the original Modification. ELEXON also made further clarification to the detail of the solution as a result of the initial consultation responses in order to make the solution clearer.

CP1458 v2.0 will introduce timescales for activities performed during the Commissioning process and for the communications obligations introduced under P283. These timescales apply only to the Supplier Volume Allocation (SVA) HH market and Current Transformer (CT) operated Metering Systems.

The proposed timescales relate to the LDSO, MOA and Supplier activities. To ensure that the process is completed within a reasonable timescale, and is completed before incorrect data can enter Settlement, timescales have been built around the:

- 'live' Energisation status of the physical connection on site; and
- Settlement Run timescales for the Initial Settlement Run (SF).

The overall process should take no longer than 26 Working Days.

Attachment B's diagram shows the timescales for CP1458 v2.0. It is only illustrative of when the LDSO owns the Measurement Transformers. Slightly different timescales will apply when these are Customer owned. In this case the MOA will perform the Commissioning but the total time taken for the end-to-end process will be the same.

Proposer's rationale

During the P283 TAPAP checks, we witnessed long delays in Commissioning where the Metering System had already become physically energised and registered in Supplier Meter Registration Service (SMRS). This presents a risk that a Meter that has not been Commissioned, and is not guaranteed to accurately record energy, will be affecting Settlement. We therefore used a month as a benchmark to judge whether 'all reasonable endeavours' to commission before Energisation had been made (as detailed in BSC Section L2.3.2). This benchmark was used to consider the time between the completion of installation and Commissioning of the Metering System and the Metering System Identifiers (MSIDs) becoming effective in SMRS and data entering SF. If the Party or Party Agents had made a number of attempts to perform the work then this was classed as 'reasonable'. However, if no attempt was made, this was not classed as 'reasonable'. This approach was supported by the PAB.

In the worst case, a Metering System was left without being Commissioned for up to ten months after Energisation. Of the total sample, 50% of LDSO sites and 49% of MOA sites had not been Commissioned at all or within a reasonable timescale.

The introduction of timescales into [BSC Procedure \(BSCP\) 514 'SVA Meter Operations for Metering System Registered in SMRS'](#) and [BSCP515 'Licensed Distribution'](#) will set a

standard for Commissioning timescales. Furthermore, it will set a standard for the sending and receiving of communications for each relevant Party or Party Agent for the installation and Commissioning of its Metering Systems. Feedback from industry during the TAPAP checks also indicated that timescales were welcomed in order for the process to be performed efficiently.

Proposed redlining

Attachments C and D contain the changes to BSCP514 and BSCP515 to deliver CP1458 v2.0.

3 Impacts and Costs

Central impacts and costs

Central impacts

CP1458 v2.0 will require changes to BSCP514 and BSCP515.

In addition, CP1458 includes a housekeeping update to BSCP514 Section 2.4.1 a). It currently contains a requirement for the MOA to send Commissioning information to the HH Data Collector (HHDC) upon any change of Meter Technical Details (MTDs), any change of associated DC or upon the MOA's appointment to an SVA Metering System. The Commissioning information is of no use to the HHDC and is not a requirement in any process. This obligation is therefore redundant and needs to be removed

No system changes are required to implement this CP and there will be no impact on BSC Agents.

Central costs

The central implementation costs for CP1458 v2.0 will be approximately £240 (one ELEXON man day) to implement the relevant document changes.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none">BSCP514BSCP515	<i>None</i>

BSC Party & Party Agent impacts and costs

CP1458 v2.0 is expected to impact Suppliers, LDSOs (including Embedded Distribution Systems Operators) and MOAs. No other BSC Parties or Party Agents are expected to be impacted.

Nine of the 11 responses to the CP Consultation indicated that they would be impacted by CP1458.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
Suppliers	Changes will be required to implement the solution.
LDSOs	
IDNOs	
MOAs	

4 Implementation Approach

Approved Implementation Date

CP1458 v2.0 will be implemented on **3 November 2016** as part of the November 2016 BSC Release as agreed by the SVG.

The November 2016 Release is the next available Release that can include this CP.

Tackling the Commissioning issues raised by the TAPAP checks is currently part of the [BSC Panel Strategic Work Programme](#). Having looked at the recent TAPAP check results, the PAB was also keen to implement this change as soon as possible.

Five of the 11 respondents to the CP Consultation agreed with the proposed Implementation Date for CP1458 v2.0. Further detail to the reasons behind this are detailed in the Consultation responses as Attachment E and in section six of this paper.



SVG's initial views

The SVG considered CP1458 at its meeting on 1 March 2016 ([SVG181/06](#)).

An SVG Member noted some concerns over the repeat escalation process if Commissioning information is not received from the MOA. ELEXON advised that it was including a footnote in the draft redlined text for BSCP515 to clarify this concern. This specified that if multiple Supplier escalations have been made to the LDSO with no response, the Supplier has the option to inform its Operational Support Manager (OSM) at ELEXON and then the PAB. However, ELEXON will try and resolve the issue before escalating to the PAB. This was included with the first consultation for CP1458 v1.0 but has since been amended.

For CP1458 v2.0, the repeat escalation has been changed to only include a single escalation from the MOA to the Supplier. This is to reinforce that under the BSC the ultimate responsibility for compliance and the overall performance of the Metering System as a whole is that of the Registrant. This was something that was highlighted in the consultation that needed clarity.

An SVG Member queried whether any timescales for Commissioning were agreed as part of P283. ELEXON advised that BSC Section L was not changed leaving it open to the Registrant to make 'all reasonable endeavours' to commission before Energisation. It also noted that no timescales were included as part of BSCP514 or BSCP515 again leaving them open to interpretation.

ELEXON provided the SVG with a verbal update on CP1458 v2.0 at its meeting on 31 May 2016 (SGV184). The SVG was informed of the re-consultation of CP1458 as CP1458 v2.0 due to the material change resulting from the removal of the NHH redlining from the solution. ELEXON added that it also restructured the redlining to improve the clarity of the solution.

An SVG Member questioned whether the version 2.0 CP would address concerns raised during the first Consultation round, to which ELEXON responded that it would.

6 Industry Views

This section summarises the responses received to the CP Consultation. You can find the full responses in Attachment E. Eleven responses were received to the CP1458 v2.0 Consultation.

Summary of CP1458 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1458 v2.0 proposed solution?	6	5	0	0
Do you agree that the draft redlining delivers the intent of CP1458 v2.0?	6	4	1	0
Will CP1458 v2.0 impact your organisation?	9	2	0	0
Will your organisation incur any costs in implementing CP1458 v2.0?	7	4	0	0
Do you agree with the proposed implementation approach for CP1458 v2.0?	5	6	0	0
Do you have any further comments on CP1458 v2.0?	3	8	0	0

Comments on the CP

Do you agree with the CP1458 v2.0 proposed solution?

Six out of 11 respondents to the consultation agreed with the proposed solution under CP1458 v2.0.

Some respondents noted concerns that there is no proposed allowance for sites with no load and highlighted no other Commissioning method were suggested for such sites. There was conflict in opinion in the responses over the timescales being proposed being too short due to the no load concerns or too long as the timescales potentially allow for a 16 Working Day (WD) unmetered period.

ELEXON notes that the 16WD period will be in place to allow for scenarios where there is no load at the time of Metering Equipment install.

ELEXON also notes the concerns regarding a supply potentially being left without a Meter. We understand that this response refers to the 'no later than 16WD after Energisation' Commissioning timescale, and that the respondent felt that if a first visit to both install and commission was unsuccessful that the supply would then be Energised with no Metering Equipment installed. The timescales state it should then be completed within the 16WD after Energisation leaving the site unmetered for that time.

This is not the intention of the timescales, so to address this, section 5.2.2.9 of BSCP514 has been added. This now separates the installation and Commissioning instruction so that installation of the Meter happens before the Commissioning timescale takes place.

A respondent noted that there is no clear definition of Energisation in the redlining and there is therefore a lack of clarity around the point at which the timescales begin. ELEXON

wishes to note that Energisation¹ is a defined term within the BSC and that the timescales begin from the actual effective date of Energisation.

A respondent noted that an extension on the current obligations would not assist compliance as there would be further strains on systems and processes that are already classed as failing. ELEXON notes that many Parties during the TAPAP checks were non-compliant as they were not Commissioning and were not communicating with other Parties or Party Agents. CP1458 v2.0 will ensure that Parties and Party Agents fulfil their obligations. However, ELEXON does appreciate that the change will require some internal adjustments to the current processes.

One respondent noted that the effectiveness of the solution could be included in future audits or similar. ELEXON notes that Commissioning is scheduled to be part of the annual BSC Audit from November 2016. The P283 Commissioning obligations, including the timescales introduced by CP1458 v2.0 will be audited as part of this.

Do you agree that the draft redlining delivers the intent of CP1458 v2.0?

Six out of 11 respondents to the Consultation agreed that the CP1458 v2.0 draft redlining delivers the intention of the change. Four respondents disagreed with one not commenting.

One respondent believes that the CoP4 requirement for the LDSO to provide calibration and test information for a new connection is not required. They suggested that only Part 1 of the Commissioning form is required. It added that the LDSO should be able to provide the calibration certificate at a later stage. ELEXON notes that the CoP4 requirements are separate to CP1458 v2.0. The phrase 'complete Commissioning information' is used to encompass any amendments to CoP4 in the future as the specific documents are not prescribed in the BSCP.

Will CP1458 v2.0 impact your organisation?

Nine out of 11 respondents to the consultation noted impacts from the proposed solution under CP1458 v2.0.

Respondents to the consultation noted that internal processes would need to be amended to account for the updated obligations introduced under CP1458 v2.0. Some respondents noted that internal systems would need to be amended to facilitate the change proposal with a varying level of cost.

Some consultation respondents noted that existing resource would need to be trained on the new process or that new resource would need to be recruited.

One respondent noted that it may not always be practical or convenient for the customer to facilitate a second LDSO visit in order to obtain Commissioning information where there was previously no load at the site.

¹ Energisation means, in relation to any Boundary Point or Systems Connection Point (or any Plant or Apparatus connected to any System at such a point), the movement of any isolator, breaker or switch or the insertion of any fuse, so as to enable electricity to flow, at such point to and from a System; and "energise" and "energised", shall be construed accordingly;

Will your organisation incur any costs in implementing CP1458 v2.0?

Seven respondents noted cost impacts that will be realised should CP1458 v2.0 be approved for implementation.

There was variance in the consultation responses in relation to the cost impacts of implementing CP1458 v2.0 that ranged from minimal costs due to document changes or large costs due to internal systems changes.

Other costs noted included the training or recruiting of staff in order to fulfil the CP1458 v2.0 requirements.

Costs noted in the consultation responses were primarily one-off costs with the exception being where additional resource on top of current levels was noted.

Do you agree with the proposed implementation approach for CP1458 v2.0?

One respondent noted that the implementation of CP1458 v2.0 could be delayed until after the implementation of [P272 'Mandatory Half Hourly Settlement for Profile Classes 5-8'](#) due to the resource constraints that this Modification brings. ELEXON notes that the BSC Auditor will be looking at P283 as part of its scope from November 2016 and therefore, implementation should not be delayed post this date. Furthermore, the PAB is also keen to implement this change as soon as possible.

The consultation responses from a number of respondents noted that the implementation timescales from decision to implementation are too short to be able to train staff, acquire extra resource where applicable and change internal systems to be able to adhere to the obligations under CP1458 v2.0.

It was noted in the consultation responses that ELEXON may raise a future change to introduce a data flow in respect of the Commissioning process. Respondents requested that the implementation of CP1458 v2.0 be aligned to this. ELEXON notes that this is a separate, unconnected change and the implementation of CP1458 v2.0 should not be implicated with a potential future change.

Further comments on CP1458 v2.0

One respondent noted concerns over the wording in sections 5.2.2.A.1, 5.2.2.A.4 and 5.2.2.A.13. The respondent also suggested a lack of clarity as to what may be deemed an acceptable defect or omission that prevents Commissioning. ELEXON notes these points relate to the completion of the processes set out in CoP4 which have the potential to affect Settlement. These include any defects or omissions identified and an assessment of the potential implications for the Registrant, Customer and Systems Operator.

One respondent suggested that there should be greater commitment to P283 from LDSOs before timescales are imposed and suggested that Commissioning responsibility could be returned to the MOAs for low voltage (LV) cut-out connected supplies where the CTs are clearly visible and ratios confirmed via comparison tests between the primary and secondary currents.

Comments on the proposed redlining

One respondent noted the following comments as displayed in the table below on the CP1458 v2.0 redlining.

Comments on the CP1458 v2.0 Proposed Redlining		
Document & Location	Comment	ELEXON's Response
BSCP514 5.2.2	Suggest "Installation" is changed to "General"	ELEXON does not feel this amendment is required as they are separate sections.
BSCP514 5.2.2.8	Suggest "Meter Systems that include" is deleted i.e. so that the sentence in brackets says (Go to section 5.2.2.A for the Commissioning of Measurement Transformers)	ELEXON has amended this section to address the concern over supplies without a Meter connected.
BSCP514 5.2.2.A	Suggest "Meter Systems that include" is deleted i.e. so that the section is titled "Commissioning of Measurement Transformers"	Commissioning includes the Meter and therefore this should not be amended.
BSCP14 5.2.2.A.4	Covered by 5.2.2.8. If it is to be retained suggest that "but no later than 16WD after energisation" is deleted.	The 16WD after Energisation is the main timescale that has been introduced to improve the time taken to perform Commissioning hence should remain unchanged.
BSCP514 5.2.2.A.5 - 5.2.2.A.8	Change "defect/omission" to "defect / omission (other than non-receipt of complete Commissioning information from the LDSO)" Suggest that these sections would sit better in Section 5.2.2 e.g. as part of Section 5.2.2.9	This includes the LDSO missing records and hence should remain unchanged.
BSCP514 5.2.2.A.9	This activity has to be completed no later than 21WD after energisation and consequently there is no allowance for the time between an LDSO sending the information (in 5.2.2.A.3) and the HHMOA receiving it (i.e. it may be sent out overnight). Suggest this is changed to	This has been amended to give the LDSO 21WD to send the information with the MOA contacting the Supplier on day 22.
BSCP514 5.2.2.A.13	Suggest that this sections would sit better in Section 5.2.2 e.g. as a new Section 5.2.2.13	This is included at the end as it refers to the end of the process.
BSCP514 5.3.5.A	Suggest new section is included - see Question 2 d) for details.	
BSCP514	Is footnote 70 relevant? - see	This will be removed as it refers to

Comments on the CP1458 v2.0 Proposed Redlining

Document & Location	Comment	ELEXON's Response
6.3.4	Question 2 e) for details.	NHH.
BSCP514 6.3.4 and 6.3.5	Footnotes 70 and 72 refers to 6.2.2.A – there is no 6.2.2.A.	
BSCP515 3.3.A	<p>Suggest "Commissioning" is changed to "Commissioning of Measurement Transformers".</p> <p>Suggest "the appropriate Codes of Practice and" is deleted so that the sentence reads "...then Commissioning procedures need to be followed in accordance with Code of Practice 4."</p> <p>Since BSCP515 relates solely to licenced distribution then suggest that in the second paragraph "a BSC Party (LDSO or other) then MOA commissioning will take place" is replaced with "the LDSO then the MOA will carry out the Commissioning procedures"</p>	<p>ELEXON accepts this point and will amend.</p> <p>ELEXON noted that all other CoPs detail accuracy classes of Metering Equipment.</p> <p>Other accounts for a BSC Party that is not the LDSO.</p>

SVG's final views

In relation to the timescales proposed in the CP1458 v2. Solution, the SVG was split as to whether these timescales were too tight or too lengthy. Overall, the SVG agreed on the timescales as a good balance and determined that the timescales would begin a positive shift in attitude within the industry towards Commissioning.

An SVG Member considered that, from the consumer's perspective, it is inexcusable to take months to Commission a Meter – assuming it is not possible to do so at Energisation in the first place. The Member added that the audit process is designed to highlight precisely these kinds of issues and expressed disappointment that escalation is necessary to get things done.

The SVG Members discussed delaying the implementation date until February 217. However, as the BSC Auditor would be looking at Commissioning during the Winter 2016/17 Audits, the SVG determined that it would be better for the inevitable non-compliances to be against the new obligations rather than the outgoing 'reasonable endeavours' Commissioning obligations.

The MRA Representative asked if a 'housekeeping' Modification is necessary to amend the 'reasonable endeavours' wording within BSC Section L 'Metering'. ELEXON noted that its legal team's advice is that the proposed BSCP timescales do not contradict the existing BSC wording and therefore no Modification is required.

Final decision

The SVG has:

- **NOTED** the industry Consultation responses to CP1458 v2.0;
- **APPROVED** the proposed changes to BSCP514 and BSCP515 for CP1458 v2.0; and
- **APPROVED** CP1458 v2.0 for implementation on 3 November 2016 as part of the November 2016 Release.

Appendix 1: Glossary & References

Acronyms

Acronyms used in this document are listed in the table below.

Acronyms	
Acronym	Definition
BSC	Balancing and Settlement Code (<i>Industry Code</i>)
BSCP	Balancing and Settlement Code Procedure (<i>Code Subsidiary Document</i>)
CoP	Code of Practice
CP	Change Proposal
CPC	Change Proposal Circular
CT	current transformer
DC	Data Collector (<i>Party Agent</i>)
HH	Half Hourly
LDSO	Licensed Distribution System Operator (<i>BSC Party</i>)
LV	Low voltage
MOA	Meter Operator Agent (<i>Party Agent</i>)
MSID	Metering System Identifier
MTD	Meter Technical Details
NHH	Non-Half Hourly
OSM	Operational Support Manager
PAB	Performance Assurance Board (<i>Panel Committee</i>)
PAF	Performance Assurance Framework
SF	Settlement Run
SMRS	Supplier Meter Registration Service
SVA	Supplier Volume Allocation
SVG	Supplier Volume Allocation Group (<i>Panel Committee</i>)
TAPAP	Technical Assurance of Performance Assurance Parties
VT	voltage transformer

External links

A summary of all hyperlinks used in this document are listed in the table below.

All external documents and URL links listed are correct as of the date of this document.

External Links		
Page(s)	Description	URL
2	P283 page on the ELEXON website	https://www.elexon.co.uk/mod-proposal/p283/

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2	PAB 171 page on the ELEXON website	https://www.elexon.co.uk/meeting/pab-171/
2	PAB 179 page on the ELEXON website	https://www.elexon.co.uk/meeting/pab-179/
2	TAPAP page on the ELEXON website	https://www.elexon.co.uk/reference/market-compliance/audits/technical-assurance-of-performance-assurance-parties/
3	BSC Sections page on the ELEXON website	https://www.elexon.co.uk/bsc-related-documents/balancing-settlement-code/bsc-sections/
4	CP1458 page on the ELEXON website	https://www.elexon.co.uk/change-proposal/cp1458/
4	BSCPs page on the ELEXON website	https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/
6	BSC Panel Strategy on the ELEXON website	https://www.elexon.co.uk/group/the-panel/
8	SVG181 page on the ELEXON website	https://www.elexon.co.uk/meeting/svg-181/
9	P272 page on the ELEXON website	https://www.elexon.co.uk/mod-proposal/p272-mandatory-half-hourly-settlement-for-profile-classes-5-8/