

# Public Minutes Performance Assurance Board (PAB)

Meeting number  
**PAB301**

Venue  
**Elexon/Remote**

Date of meeting  
**27 November 2025**

Classification  
**Public**

## Attendees and apologies

Attendees			Apologies		
Holly Abbott	HA	PAB Chair	Colin Paine	CP	PAB Member
Marianne Haslam	MH	PAB Vice Chair	David Tod	DT	PAB Member
Emilie Lalonde	EL	Technical Secretary	James Murphy	JM	PAB Member
Andrew MacFaul	AM	Ofgem Representative	Jon Dixon	JD	PAB Member
Ayesha Uvais (Jon D proxy)	AU	PAB Member			
Claire Henderson	CHE	PAB Member			
Clare Hannah	CH	PAB Member			
Dominic Bradbury	DB	PAB Member			
Fungai Madzivadondo	FM	PAB Member			
Graeme Cunningham	GC	PAB Member			
James Evans	JE	PAB Member			
Jenny Booth	JB	Ofgem Representative			
Kevin Woolard	KW	Panel Representative			
Phil Eyre	PE	PAB Member			
Phil Russell	PR	PAB Member			
Rox Inskip-Kaye	RIK	PAB Member			
Simon Harrison	SH	PAB Member			
Tom Chevalier	TC	PAB Member			

## Part I: Public Session

### 1. Quarterly Threshold Review

#### 1.1 The PAB;

- a) **APPROVED** maintaining the threshold applied for the focus Suppliers in the NHH (MC A and MC F) Market Segments at 1,250MWh and a corresponding 625MWh EFR exit criteria;

- b) **APPROVED** maintaining the threshold applied for the focus Suppliers in the HH MC C and non-domestic Sub 100kW (MCs E and G) Market Segments at 850MWh and a corresponding 425MWh EFR exit criteria;
- c) **APPROVED** maintaining the threshold applied for the focus Suppliers in the NHH Export Market to 1,000MWh and a corresponding 400MWh EFR exit criteria; and
- d) **NOTED** the likely changes to the thresholds at the next quarterly review and that Elexon will confirm or amend these indicative approaches in November.

## 2. Qualification Readiness Assessment

### 2.1 Key discussions;

- a) A PAB member queried whether the assessment covered exemptions for Suppliers. Elexon replied that exemptions were not included.
- b) A PAB member questioned whether the Qualification Readiness Assessment (QRA) adequately assessed Supplier processes for managing Unmetered Supplies (UMS). Elexon assured confidence in the assessment questions on UMS and noted an ongoing evaluation of the Qualification Testing Framework (QTF) to ensure no gaps and added it would review the questions and is open to feedback on the report.
- c) A PAB member raised concerns about fairness, cost and proof of capacity when placing reliance as a proposal. Elexon confirmed reliance applications are reviewed case by case and is open to developing set of criteria for fairness and resources.
- d) A PAB member noted commissioning questions were missing from the assessment and stressed they should feature as are a fundamental Advanced Data Service (ADS) activity. Elexon explained commissioning was not featured across related BSC documents which were referenced when making the QRA to ensure alignment. Elexon agreed to conduct a deeper review of the commissioning section and committed to take on feedback from the PAB.
- e) A PAB member highlighted the need for requirements to align with BSCPs and to address any gaps. Elexon committed to review alignment with new requirements.
- f) A PAB member noted reliance can add value, especially with new Market Entrants, and it should continue to feature in the assessment. Elexon suggested adding questions to track the reliance agreements and noted a separate Change Proposal (CP) to mitigate long-term concerns with placing reliance would be discussed in the next agenda item.
- g) A PAB member queried whether the questions on User Integration Testing (UIT) in Section 0 may create barriers to Market Entry and if it is positioned correctly. Elexon noted the importance of applicants being aware of their requirement to conduct internal testing as part of the assessment because it ensures they are undergoing testing to support QTF and gives them opportunities to rework plans. Elexon confirmed it is positioned to gauge plans and approach and not expecting them to provide proof of testing at this stage.
- h) A PAB member suggested clarifying where Section 0 belongs in the Qualification process. Elexon confirmed it is developing a Market Entry flowchart to illustrate the journey.
- i) A PAB member asked whether Section 0 is better placed in the QRA or discussed during initial conversations with new Market Entrants. Elexon agreed to consider the format of Section 0 questions and engaging the Market Entry team to facilitate this discussion in a customer-friendly way. It proposed organising a workshop for PAB members to feed into the alignment of Section 0 with the Market Entry journey.

### 2.2 The PAB;

- a) **COMMENTED** the Qualification Readiness Assessment v1.0 (Attachment A).

### 3. New CP 'Integrate Placing Reliance within BSCP537 to Support Enduring Qualification'

#### 3.1 Key discussions;

- a) A PAB member suggested splitting non-contentious, housekeeping items into a separate CP to allow quicker progression, while placing more contentious items into a different CP for further debate. Elexon agreed to this approach and confirmed it will book an engagement session with PAB to discuss Section 0, Placing Reliance and the Market Entry journey and acknowledged the risk of delaying consultation and suggested progressing both CPs in parallel.
- b) A PAB member queried whether to progress with the current consultation or wait for industry feedback, given the contentious items, and noted merit in seeking industry feedback to confirm alignment with risks. Elexon offered to first hold an engagement session to allow more time to discuss the formal Placing Reliance mechanism before going to industry for feedback on the CPs.
- c) A PAB member asked whether industry would see all questions in the QRA. Elexon confirmed industry would see all questions to obtain its wider feedback.
- d) A PAB member noted risks in obtaining industry feedback, including low response rates and varying levels of understanding of the process of Qualification. Elexon offered a solution to offer two webinars to obtain industry feedback on the Placing Reliance CP and the QRA on the whole, given the complexity of the document.
- e) A PAB member queried the normal process for industry consultation and raised concerns about a wholesale approach, to ensure the committee are not setting the precedence in governance. Elexon were uncertain and agreed that it was important point.
- f) A PAB member highlighted that BSCP 537 Section 2.83 should be brought into the engagement session to clarify who approves Placing Reliance. Elexon confirmed it will form part of the discussion to ensure agreement on roles and responsibilities.

#### 3.2 The PAB;

- a) **NOTED** the proposed progression timetable for the CP;
- b) **PROVIDED** any comments or additional questions for inclusion in the CP Consultation; and
- c) **NOTED** that this CP will be presented to:
  - the PAB on 27 November 2025; and
  - the SVG and ISG on 4 December 2025.

### 4. BSC assessment Criteria for Qualification

4.1 Elexon invited the PAB to approve the BSC Assessment for MHHS Qualification.

#### 4.2 The PAB;

- a) **APPROVED** the BSC Assessment Criteria for MHHS Qualification v5.1 (Attachment A).

### 5. Assurance of Parties with Large EAC AA Consumption

#### 5.1 Key discussions;

- a) A PAB member highlighted Profile Class (PC) 8 as high risk, as it is mainly used for Export MSIDs where a Supplier could benefit from overstated volumes. They expressed concern at Elexon's proposal to remove all PC8 Annual Advances (AA) and Estimated Annual Consumption (EAC) from the report to mitigate false positives caused by known issues with profile coefficient values for dates between December and March each year. The PAB Member suggested assuring PC8 based on kWh per day values rather than EAC/AA values. Elexon agreed with the Member's broader point but noted that the use of kWh per day values was not

practical, suggesting instead that the tool exclude only PC8 AAs with start or end dates in that period. Elexon added that the reported NHH export volumes available through CARP could be used as an additional control in this area.

- b) A PAB member requested clarification on the Radio Teleswitch Service (RTS) issue. Elexon confirmed it was limited to a small number of dates where profile coefficients were incorrectly set to zero, creating a similar effect to PC8. Only those specific RTS instances will be removed.
- c) A PAB member asked whether re-defining the threshold for large EACs and AAs would increase the number of items classified as such. Elexon anticipated that errors will reduce overall due to more accurate profile coefficients, date ranges and improved calculation methods and have already seen a reduction.
- d) A PAB member queried Elexon's view on materiality calculations and Settlement impact, noting other costs associated with Settlement error such Distribution Use of System (DUoS) charges. Elexon confirmed materiality calculations are indicative only and not part of formal Settlement or Trading Charges. Elexon's main focus remains on ensuring data accuracy as a key control to support accurate Trading Charges.

## 5.2 The PAB;

- a) **NOTED** the development of a new software tool to automate the assessment of the material impact of Suppliers' use of excessive EACs and AAs;
- b) **APPROVED** that the tool and approach be adopted as the standard methodology for assessing the material impact of Suppliers' use of excessively large EACs and AAs, in order to support decisions on the deployment of other Performance Assurance Techniques (PATs);
- c) **APPROVED** the use of new average EACs and AAs used for the relevant Profile Classes; and
- d) **APPROVED** that the tool be set to exclude EACs and AAs from Profile Classes and SSCs known to return large EACs and AAs that are impacted by RTS.

## 6. **Creation of Category 3 BSC Configurable Items for Accurate/Limited Status and Settlement Performance Weightings of CCC ID's**

### 6.1 Key discussions;

- a) A PAB member asked how the data will be stored as they evolve. Elexon confirmed that the data will be accessible in CSV and Word document formats, with plans to make CSV files available on the Digital Code site.
- b) A PAB member asked where the crib sheet document will be stored for feedback. Elexon noted that the crib sheet is not currently published and is not a controlled document, but it can be circulated beyond PAB members if required.
- c) A PAB member asked if there is a mechanism for feedback when this is used. Elexon agreed that ahead of any new Supplier Charges or Market Wide arrangements, it should signpost these key documents to ensure industry awareness. Elexon committed to making sure all Party's are informed and acknowledged the importance of visibility.

## 7. **Data Classification briefing**

### 7.1 Elexon shared a Data Classification update to the PAB.

### 7.2 The PAB;

- a) **NOTED** the update in data classification;

- b) **NOTED** that papers could come to Panel or its Committee with a default classification of confidential, but that Panel or Committee Members can downgrade this classification in the interest of transparency for industry; and
- c) **NOTED** that this briefing will also go to all Panel subcommittees for consistency and transparency.